



Material Changes Check and Bat Emergence/Re-entry Surveys

Hatchgate End, Hatchgate Lane, Cockpole Green, Wargrave, Berkshire, RG10 8NE

Mr and Mrs Hart

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Industry Guidelines and Standards

This report has been written with due consideration to:

- Chartered Institute of Ecology and Environmental Management (2017). Guidelines for Preliminary Ecological Appraisal. 2nd edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2018). Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater, Coastal and Marine. Version 1.1. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2017). Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester.
- Chartered Institute of Ecology and Environmental Management (2020). Guidelines for Accessing, Using and Sharing Biodiversity Data in the UK. 2nd Edition. Chartered Institute of Ecology and Environmental Management, Winchester.
- British Standard 42020 (2013). Biodiversity – Code of Practice for Planning and Development.
- British Standard 8683:2021 (2021). Process for Designing and Implementing Biodiversity Net Gain.

Proportionality

The work involved in preparing and implementing all ecological surveys, impact assessments and measures for avoidance, mitigation, compensation and enhancement should be proportionate to the predicted degree of risk to biodiversity and to the nature and scale of the proposed development. Consequently, the decision-maker should only request supporting information and conservation measures that are relevant, necessary and material to the application in question. Similarly, the decision-maker and their consultees should ensure that any comments and advice made over an application are also proportionate.

This approach is enshrined in Government planning guidance, for example, paragraph 174 of the National Planning Policy Framework for England.

The desk studies and field surveys undertaken to provide a Preliminary Ecological Appraisal (PEA) might in some cases be all that is necessary.

(BS 42020, 2013)

Executive Summary

Arbtech Consulting Limited was instructed by Mr and Mrs Hart to undertake a Material Changes Check (MCC) and Bat Emergence/Re-entry Surveys (BERS) at Hatchgate End, Hatchgate Lane, Cockpole Green, Wargrave, Berkshire, RG10 8NE (hereafter referred to as “the site”). The survey was required to inform a planning application for demolition of existing dwelling and construction of replacement dwelling (hereafter referred to as “the proposed development”).

The following bat roost was identified at the site:

- A day roost of one brown long-eared bats was identified within the two loft voids of B1, with an access point at the ridgeline near the central chimney (identified in 2017 and 2018 by Windrush Ecology).

This roost is considered to have low conservation value, in line with the Bat Mitigation Guidelines (English Nature, 2004).

No emergences were seen during the current survey effort. No significant changes to the roost identified in 2017 and 2018 by Windrush Ecology were noted.

An EPSL application to Natural England will be required to legally permit the proposed works. Due to the number of roosts and species present, the site is eligible for a Bat Mitigation Class Licence (BMCL). The BMCL application requires that surveys have been undertaken within the most recent active bat season (May to September) and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.

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1.0 Introduction and Context

1.1 Background

Arbtech Consulting Limited was instructed by Mr and Mrs Hart to undertake a Material Changes Check (MCC) and Bat Emergence/Re-entry Surveys (BERS) at Hatchgate End, Hatchgate Lane, Cockpole Green, Wargrave, Berkshire, RG10 8NE (hereafter referred to as “the site”). The survey was required to update previous survey effort in 2017 and 2018 by Windrush Design Ltd to support a planning application for demolition of existing dwelling and construction of replacement dwelling (hereafter referred to as “the proposed development”).

A Bat Survey Report & Bat Mitigation Strategy was carried out by Windrush Design Ltd in 2018 (Windrush Design Ltd, 2018). This report included survey data from the 2017 and 2018 bat survey seasons. Internal inspections conducted by Windrush Design on the 19th of September 2017 and the 6th of June 2018 found a single brown long-eared bat in the second loft space on both occasions, and a single brown long-eared bat emergence was observed.

This report concluded that “Prior to the commencement of works a bat licence will be secured from Natural England to permit the destruction of a brown long-eared bat day/transitional roost. A Low Impact Bat Class Licence is considered appropriate due to the following”.

Subsequently, a low impact class licence was obtained for the site but has since expired.

The aim of the MCC and BERS was to confirm the conclusions of the 2017 and 2018 assessments of the site by Windrush Design Ltd, and to check that no material changes to the site's condition and usage by bats had occurred. This check also aimed to gain an understanding of how bats use the site for roosting, foraging or commuting. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2016). The BERS aimed to characterise the roosts present and were undertaken with due consideration to the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2016).

1.2 Site Context

The site is located at National Grid Reference SU 79989 81075 and has an area of approximately 0.01ha comprising of a residential dwelling (B1), a carport (B2) and a garden with scattered trees, grassland and hedgerow boundaries. It is located on a rural residential lane with arable fields in the surrounding landscape.

A site location plan is provided in Appendix 1.

1.3 Scope of the Report

MCC

This report provides a description of all features suitable for roosting, foraging and commuting bats and evaluates those features in the context of the site and wider environment. It further documents any physical evidence collected or recorded during the site survey that establishes the presence of roosting bats. It provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any further surveys to inform subsequent mitigation proposals, achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- A desk study has been carried out.
- A field survey has been undertaken, including an external survey and internal inspection of built structures where possible, to determine the presence or the suitability of any features which bats could use for roosting and to assess the suitability of the site's bat foraging and commuting habitat.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for further surveys and mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

BERS

This report provides a description of the bat activity observed and recorded during BERS. The aim of the surveys was to determine the presence or likely absence of bats and to characterise any roosts present including species, number of individuals, number and location of roost access points, and to gain an understanding of how bats use the site. The report provides information on possible constraints to the proposed development as a result of bats and summarises the requirements for any mitigation proposals, including a European Protected Species Licence (EPSL), where appropriate, to achieve planning or other statutory consent and to comply with wildlife legislation.

To achieve this, the following steps have been taken:

- BERS of built structures has been undertaken to determine the presence or likely absence of bat roosts.
- An outline of potential impacts on any confirmed or unidentified roosts has been provided, based on the proposed development.
- Recommendations for mitigation have been made, along with advice on the requirements for a European Protected Species Licence (EPSL) application if appropriate.
- Opportunities for the enhancement of the site for roosting, foraging and commuting bats have been set out.

2.0 Methodology

2.1 Desk Study

The desk study included a 2km radius review of the magic.gov.uk database for statutory designated sites with bat qualifying interests. An assessment of the surrounding landscape structure was also completed using aerial images from Google Earth and OS maps.

2.2 MCC Field Survey

The survey was undertaken by Dr James Fielding BA (Hons) PGCert (Merit) DPHIL, Consultant Ecologist (Natural England Bat Licence Number 2022-10412-CL17-BAT) on 05/05/2022.

The MCC focussed on one built structure which will be affected by the proposed development as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat.

For any surveyed buildings:

A non-intrusive visual appraisal was undertaken from the ground, using binoculars to inspect the external features of the building for features which bats could use for roosting, including access or egress points and for signs of bat use including droppings, scratch marks, insect remains and urine smear marks. An internal inspection of the building was also made, including the living areas and any accessible roof spaces, using a torch and ladders. The surveyor paid particular attention to the floor and flat surfaces, window shutters and frames, lintels above doors and windows, and carried out a detailed search of numerous features within the roof space. An endoscope was used to complete a close-up inspection of any accessible features, where appropriate.

2.3 Breeding Birds and Other Incidental Observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of presence or signs of breeding birds.

2.4 Suitability Assessment

Built structures were categorised according to the likelihood of bats being present and the types of roost that the identified features could support. This is summarised in Table 1 for buildings below. Roost suitability is classified as high, moderate, low and negligible and dictates any further surveys required before works can proceed.

Table 1: Features of a building that are correlated with use by bats

Classification	Feature of building and its context
Moderate to high	Buildings or structures with features of particular significance for larger numbers of roosting bats e.g. mines, caves, tunnels, icehouses and cellars. Habitat on site and surrounding landscape of high quality for foraging bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland. Site is connected with the wider landscape by strong linear features that would be used by commuting bats e.g. river and or stream valleys and hedgerows. Site is proximate to known or likely roosts (based on historical data). Buildings with high suitability could support roosts of high conservation value such as maternity or hibernation roosts.
Low	A small number of possible roost sites or features, used sporadically by individual or small numbers of bats. Potential roost features may be suboptimal for reasons such as shallow depth, poor thermal qualities or upwards orientation with exposure to inclement weather or predators.

	Habitat suitable for foraging in close proximity, but isolated in the landscape. Or an isolated site not connected by prominent linear features. Few features suitable for roosting, minor foraging or commuting.
Negligible	Unsuitable for use by bats.

2.5 BERS

Two BERS, comprising of one dusk and one dawn emergence survey, was undertaken of B1 to update the survey effort carried out in 2017 and 2018. The surveys involved three surveyors positioned around the buildings, ensuring that all elevations and roof sections with suitable roosting features could be clearly observed. Particular attention was paid to the areas of the building identified as providing suitable access points to bat roosts. Each surveyor was assigned an area of the building to observe for the duration of the survey. Dusk emergence surveys commenced 15 minutes before sunset and continued for 1½ hours after sunset. Surveys were completed during optimal weather conditions i.e., when temperatures were above 10°C, with no rain or strong winds (greater than 5m/s), as these adverse weather conditions can impact bat emergence and foraging behaviour. Periods of high moon illuminance (>80%) were also avoided insofar as possible as this can reduce bat activity.

Surveyors used heterodyne and frequency division bat detectors, and Echo Meter Touch detectors connected to iPads or Android tablets. Bat echolocation calls recorded during the surveys were analysed using Wildlife Acoustics sound analysis software Kaleidoscope V3.1.7 when required. The Echo Meter Touch includes an auto ID function for bat species, however this is not 100% accurate and further post-survey sound analysis is often required to confirm species that could not be identified by the auto ID software during the survey. Surveyors also used head torches, survey record sheets and pens/pencils for recording all activity observed during the surveys. Each surveyor was also provided with a handheld radio for communication between surveyors to assist with confirming ambiguous bat activity e.g. a bat emergence or a bat passing over the building.

2.6 BERS Surveyors

The lead surveyor was Anna Smith, assisted by one additional surveyor, each with several years of bat experience. In total, two surveyors were used to provide sufficient coverage of the building during the BERS. The designated position of each surveyor during each survey is detailed in the tables in Section 3.1 below and shown on the plan in Appendix 3.

2.7 Limitations

MCC

It should be noted that whilst every effort has been made to describe the features on site in the context of their suitability for roosting bats, this does not provide a complete characterisation of the site. This survey provides a preliminary view of the likelihood of bats being present. This is based on suitability of the habitats on site and in the local area, the ecology and biology of bats as currently understood. Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

There were no specific limitations to the Material Changes Check survey.

BERS

These surveys follow best practice guidance to confirm presence or likely absence of roosting bats and where present, characterise the roost. However, this information is collected at finite dates and times, and provides an indication of the conditions on site only. The use of the building, and the site as a whole by bats, at all times cannot be established based on this information.

Bats are highly mobile creatures that switch roosts regularly and therefore the usage of a site by bats can change over a short period of time.

There were no specific limitations to the emergence surveys.

3.0 Results and Evaluation

3.1 Desk Study Results

A summary of desk study results is provided below.

3.2 Designated Sites

No statutory designated sites with bat qualifying interests were found within a 2km radius of the site.

3.3 Landscape

A review of aerial photographs (Google Earth) the magic.gov.uk database and OS maps has been undertaken. Collated together, the value of the landscape for bats is described below:

The site is in a rural area south of Cockpole green, located within Berkshire, 3.3km south east of Henley-on-Thames. Its immediate landscape is dominated by open grassland, arable fields and woodlands. Areas of woodland within the local landscape could be used by wildlife for shelter, foraging, and commuting.

3.4 Historical Records

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed sites <2km away from the survey site will find alternative habitat either within the mitigation measures implemented as part of the licence or will relocate to other known roosts sites in close proximity to the licensed site. EPSL records for bats are summarised in Table 2.

Table 2: Granted EPSLs for bats within 2km of the site

<i>EPSL reference</i>	<i>Approx. distance from site</i>	<i>Bat species affected</i>	<i>Licence start date:</i>	<i>Licence end date:</i>	<i>Impacts allowed by licence</i>
2014-2875-EPS-MIT	625m south east	Brown long-eared bat	12/09/2014	30/09/219	Destruction of a resting place
2019-41331-EPS-MIT	800m south east	Common pipistrelle, soprano pipistrelle	26/06/2019	30/09/2020	Destruction of a resting place
2019-41331-EPS-MIT-1	1175m east	Common pipistrelle, soprano pipistrelle	10/12/2019	30/09/2020	Destruction of a resting place
2018-34287-EPS-MIT-1	1175m east	Common pipistrelle, soprano pipistrelle	22/05/2018	31/10/2018	Destruction of a resting place
2015-7300-EPS-MIT-2	1200m south west	Common pipistrelle, Soprano pipistrelle. Brown long-eared bat.	19/11/2015	30/04/2020	Destruction of a resting place
EPSM2011-2958	1700m north west	Common pipistrelle.	19/04/2011	31/08/2012	Destruction of a resting place
EPSM2011-2915	1950m north west	Common pipistrelle, soprano pipistrelle, brown long-eared bat, whiskered bat.	08/03/2011	28/02/2013	Destruction of a resting place

3.5 MCC Field Survey Results

The MCC focussed on one structure (B1) which will be affected by the proposed development and the conjoining roof structure between them (B3) as well as providing an overview of the wider site and the surrounding landscape for bat roosting, foraging and commuting habitat. The results of the field survey are illustrated in Appendix 2. The weather conditions recorded at the time of the survey are shown in Table 3.

Table 3: Weather conditions during the survey

Date: 02/08/2022	
Temperature	30°C
Humidity	37%
Cloud Cover	0%
Wind	0 mph
Rain	None

Building 1 (B1)

Building B1 Exterior

B1 is a two-storey building with a hipped and cross-gabled roof clad in clay roof tiles which are in moderate condition, with several loose tiles and gaps. There are two chimneys on the roof of B1, with lead flashing at the base which is in good condition. There are multiple dormer windows on the eastern and western elevations, which are clad in clay hanging tiles. There is a bay window with a hipped roof on the western side of the building, with loose lead flashing above it. No material changes were observed from the results of the 2018 report by Windrush Ecology.



Figure 1. (above): western and southern elevations of B1.



Figure 2. (above): eastern elevations of B1



Figure 3. (above) Loft void 1 (southern) interior roof structure of B1,



Figure 4. (above) Droppings within void 1 B1.



Figure 5. (above) Loft void 2 (northern), interior of B1,



Figure 6. (above) Droppings within the loft void 2 of B1.

B1 Interior

There are two loft spaces within the main roof void of B2. The roof structure is built from modern timber beams including the ridge beam. The roof is lined with bitumen felt which is in good condition with no gaps or tears. The floor of the loft space is lined with mineral wool insulation and there are timber boards in places.

No daylight enters the loft space which indicates that it is well sealed. Several hundred bat droppings were present within the loft space of B1 – with approximately 150 droppings in each of the two loft spaces.

This building was identified as having a high potential for supporting crevice and void dwelling bats in 2017 and 2018 (Windrush Ecology Ltd, 2018)

Evidence of bats (B1).

Approximately one hundred and fifty bat droppings are scattered loosely throughout the southern loft space (loft space 1), and approximately the same number are present within the northern loft space (loft space 2). The size and shape of these bat droppings suggests they come from brown long-eared bats. This is consistent with the number of droppings observed in 2017 and 2018, suggesting no significant change in usage has occurred.

On the 17th of September 2017, and on 6th of Jun 2018, a brown long eared bat was identified within the southern loft space of B1 (Windrush Ecology Ltd, 2018). No bats were seen during

the internal inspection in 2022.

Breeding birds and other incidental observations

There was no evidence of nesting birds located internally or externally on B1.

Foraging and Commuting Habitat

The site contains grassland, scattered trees and shrubs which could provide excellent foraging habitat for bats.

3.6 BERS Survey Results

The results of the BERS survey are provided in Tables 4 – 5 below and illustrated in Appendix 2.

Table 4: Survey results (first visit)

Date		05/05/2022
Start and end times		20:49 – 22:35 Sunset: 20:35
Weather conditions		Start: Temp: 14°C Relative Humidity: 69% Cloud Cover: 10% Wind: 2mph Rain: None End: Temp: 12°C Relative Humidity: 78% Cloud Cover: 40% Wind: 0.0 mph Rain: None
Surveyor (position) As shown in Appendix 2		Tom Drew - Position 1 – observing the west elevation and roof structure of B1) Anna Smith - Position 2 – observing the eastern elevation and roof structure of B1)
Building reference	Surveyor position	Notes/observations:
B2	1	No emergencies were observed. The first bat activity observed was a pass by soprano pipistrelle from east to west through the sites garden At 21:15 a noctule bat was heard but not seen, with subsequent heard-but-not-seen records at 21:21, 21:32, 21:35, 21:47, 22:01. At 21:16 to 22:24 frequent heard-but not seen calls of a common pipistrelle were recorded From 21:20 to 22:13 several heard-but not seen calls of a soprano pipistrelle were recorded At 21:21 a soprano pipistrelle passed from north west to south east across the back garden At 21:25 a soprano pipistrelle passed from south to east across the sites drive to the south of B1 At 21:53 a common pipistrelle passed from north-east to south-west, rounding the corner of B1 No further bat activity was observed.
B1	2	No emergencies were observed. The first bat activity recorded from Position 1 was a pass by a soprano pipistrelle which passed from north to south at 21:06 along the eastern boundary. At 21:10 and 21:11 a common pipistrelle was heard-but-not-seen. At 21:15 and 21:21 noctule bats were heard-but-not-seen At 21:27 a soprano pipistrelle was heard-but-not-seen At 21:28 a soprano pipistrelle passed from north to south along the eastern boundary. At 21:35 a noctule bat was heard-but-not-seen At 21:40 a common pipistrelle passed along the eastern boundary from south to north At 22:25 a common pipistrelle was heard-but-not-seen No further bat activity was observed.

Table 5: Survey results (second visit)

Date		02/06/2022
Start and end times		04:15 – 06:15 Sunrise: 06:15
Weather conditions		Start: Temp: 13°C Relative Humidity: 90% Cloud Cover: 5% Wind: 1mph Rain: None End: Temp: 12°C Relative Humidity: 91% Cloud Cover: 5% Wind: 2mph Rain: None
Surveyor (position) As shown in Appendix 3		Anna Smith Position 1 – observing the west elevation and roof structure of B1 Jane Plenderleith Position 2 – observing the eastern elevation and roof structure of B1.
Building reference	Surveyor position	Notes/observations:
B2	1	No emergences were observed. The first bat activity recorded from Position 1 was a heard-but-not-seen record of a noctule bat at 04:19. A soprano pipistrelle was heard but not seen at 04:49. At 05:32 a noctule bat was heard-but-not-seen.
B1	2	No emergences were observed. The first bat activity observed was a heard-but-not-seen recording of a noctule bat at 04:20 At 04:28 two natterers bat was seen foraging around the eastern boundary of the site At 04:50 a common pipistrelle commuted along the eastern boundary of the site At 05:05 a soprano pipistrelle was heard-but-not-seen At 05:12, 05:25, 05:32 and 05:34 noctule bats were heard-but-not-seen.

4.0 Conclusions, Impacts and Recommendations

4.1 Informative Guidelines

A summary of the relevant legislation and planning policies is provided in Appendix 3.

Bats

Bats are protected under the Wildlife and Countryside Act and the Conservation of Habitats and Species Regulations 2017 (amended by the Conservation of Habitats and Species Regulations (amendment) (EU Exit) Regulations 2019).

There are three possible outcomes of this survey, each with specific recommendations. These are outlined below:

Confirmed bat roost

Best practice survey guidelines (Collins, 2016) recommend additional surveys for confirmed roosts. Three further surveys are required to characterise the bat roost present including species, roost type and access points to inform an EPSL application to Natural England. Surveys must be completed during the active bat season (May – September). At least two of the surveys should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey.

Low, moderate or high likelihood of a bat roost present

Best practice survey guidelines (Collins, 2016) recommend additional surveys for features assessed as having low to high suitability for roosting bats. One, two or three further surveys are required to confirm presence or likely absence of a bat roost, based on a low, medium or high roost likelihood evaluation. Surveys must be completed during the active bat season (May – September). If more than one survey is recommended, at least one of them should be completed during the optimal survey period mid-May to August, and at least one of the surveys should be a dawn re-entry survey. If two or one further survey is recommended these surveys must be completed during the optimal survey period (mid-May to August). For low and moderate roost likelihood evaluation the survey effort recommended at this stage is iterative and if bats roosts are confirmed in the building, a further survey will be required to provide sufficient information to inform an EPSL application to Natural England.

Negligible likelihood of a bat roost present

Buildings assessed as comprising negligible suitability for roosting bats do not normally require further surveys. However, if bats are found during any stage of the development, work should stop immediately, and a suitably qualified ecologist should be contacted for further advice.

An EPSL **will be required** to enable the proposed development to be lawfully undertaken, whilst ensuring the favourable conservation status of the species concerned in their natural range. Alternatively, a low impact bat mitigation class licence (BMCL) will be sufficient. Appropriate justification for this assessment is provided in Table 6 of this report. The EPSL and BMCL applications requires that all surveys have been undertaken within the most recent active bat season and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.

Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law. Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

1. *include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;*
2. scientific and educational purposes,
3. ringing or marking
4. conserving wild animals

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.

4.2 Evaluation

Taking the desk study and field survey results into account, Table 6 presents an evaluation of the value of the site for bats and also details any other ecological constraints identified such as nesting birds in relation to the proposed development (consisting of demolition of existing dwelling and construction of replacement dwelling).

Table 6: Evaluation of the site for bats and any other ecological constraints

Feature	Survey conclusions (with justification)	Foreseen impacts	Recommendations <i>Measures required to adhere to guidance, legislation and planning policies.</i>	Biodiversity Enhancements <i>The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021).</i>
Roosting Bats (B1)	A day roost of one brown long-eared bats is identified within the loft of B1, as evidenced by droppings found within the loft void in 2017, 2018 (Windrush Ecology Ltd, 2018) and 2022 (Arbtech Consulting Ltd, 2022), and a brown long-eared bat being found within the first (southern) loft space on the 19th September 2017 and on the 6th June 2018 (Windrush Ecology Ltd, 2018) and the emergence of a brown long-eared bat from the ridge near the chimney stack on the same evening. No emergences or significant material changes to this roost were determined by this set of surveys. The MCC found the building to be in the same condition with bat droppings present in the loft void. However, no emergences were recorded. Therefore concluded to be a day roost of a single BLE	The proposed development will result in the demolition of the dwelling. This will destroy the bat roost. This may also result in disturbance, death or injury to bats. The new development will not involve significant changes in lighting.	An EPSL application to Natural England will be required to legally permit the proposed works. Due to the number of roosts and species present (one of low conservation value), the site is eligible for a Bat Mitigation Class License (BMCL). The BMCL application requires that surveys have been undertaken within the most recent active bat season (May to September) and planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission. The BMCL will include the following measures: • The installation of one cavity-style bat box at the site (one bat box per species) prior to works commencing to form a receptor site for any bats found during the works. These boxes may be installed on buildings or trees but must be in an undisturbed location and will need to be maintained in this location post-development. Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light. • The provision of a toolbox talk to contractors, by the Registered Consultant or an Accredited Agent, to inform them of the presence of bat roosts. • A pre-commencement inspection of any roost features by the Registered Consultant or an Accredited Agent using a torch and an endoscope (this may be via ladders, scaffolding or a mobile elevated platform). • The removal of bat roost features by hand under the supervision of the Registered Consultant or an Accredited Agent (where it is not possible conclude absence of bats during the pre-commencement inspection).	The installation of a minimum of one additional bat box (for a total of two) on mature trees around the site boundaries or on retained buildings will provide additional roosting habitat for bats e.g. 2F Schwegler Bat Box (trees) 1FF Schwegler Bat Box (trees) 2FN Schwegler Bat Box (trees) Beaumaris Bat Box (buildings) Vivara Pro Woodstone Bat Box (buildings) Or a similar alternative brand. Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light.

	used occasionally This roost is considered to have low conservation value, in line with the Bat Mitigation Guidelines (English Nature, 2004).		- Avoiding the use of unnecessary lighting, particularly at night, or implementing a low impact lighting strategy to avoid illumination of retained or newly created roosts or roost features. - Avoiding excessive noise or vibration disturbance e.g. from power tools or radios, within close proximity of retained or newly created roosts or roost features.	
Foraging and commuting bats	The grassland and trees on site could provide value for foraging and commuting bats.	The new development will not result in significant loss of habitat or changes in lighting.	None.	None.
Nesting birds (B1)	The building or tree offers no opportunities for nesting birds.	None.	None.	The installation of a minimum of one bird box on mature trees around the site boundaries or on retained buildings will provide additional nesting habitat for birds e.g. Schwegler 1B Nest Boxes Schwegler 2H Robin Boxes Woodstone Nest Box Or a similar alternative brand. Tree boxes should be positioned approximately 3m above ground level where they will be sheltered from prevailing wind, rain and strong sunlight. Small-hole boxes are best placed approximately 1-3m above ground on an area of the tree trunk where foliage will not obscure the entrance hole.
Other ecological constraints	None identified.	N/A	N/A	N/A

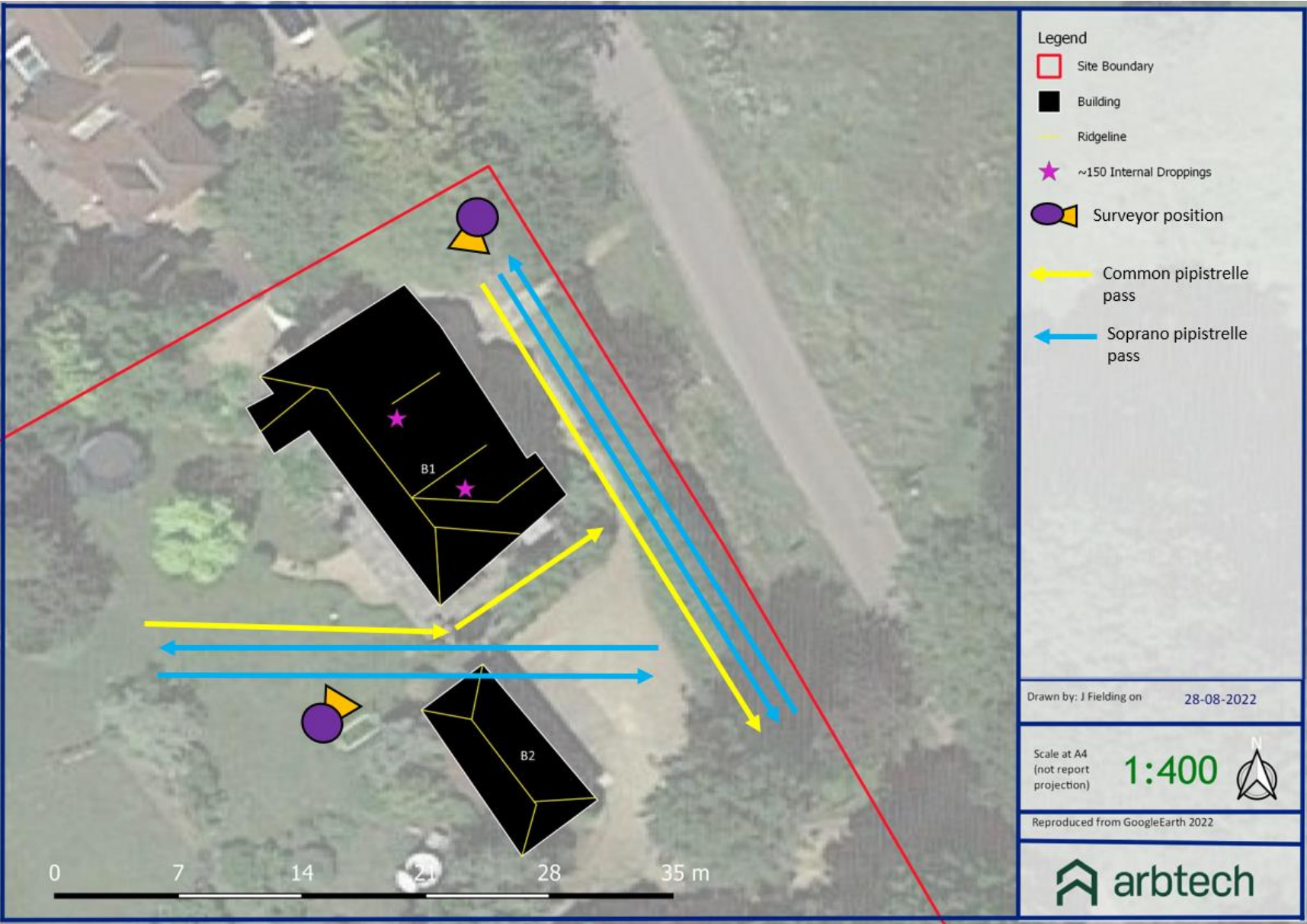
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Appendix 1: Site Location Plan



Appendix 2: Bat Survey Plan



Appendix 3: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

All species of bat are fully protected under *The Conservation of Habitats and Species Regulations 2017* (as amended) through their inclusion on Schedule 2.

Regulation 43: Protection of certain wild animals - offences

(1) A person is guilty of an offence if they:

- (a) Deliberately captures, injures or kills any wild animal of a European protected species,
- (b) Deliberately disturbs wild animals of any such species,
- (c) Deliberately takes or destroys the eggs of such an animal, or
- (d) Damages or destroys a breeding site or resting place of such an animal,

(2) For the purposes of paragraph (1) (b), disturbance of animals includes in particular any disturbance which is likely—

- (a) To impair their ability:
 - (i) To survive, to breed or reproduce, or to rear or nurture their young; or
 - (ii) In the case of animals of a hibernating or migratory species, to hibernate or migrate; or
- (b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the *Wildlife and Countryside Act 1981* (as amended) through their inclusion on Schedule 5. Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection
- Selling, offering or exposing for sale, possession or transporting for purpose of sale

NATIONAL PLANNING POLICY (ENGLAND)

National Planning Policy Framework 2021

The National Planning Policy Framework promotes sustainable development. The Framework specifies the need for protection of designated sites and priority habitats and species. An emphasis is also made on the need for ecological infrastructure through protection, restoration and re-creation. The protection and recovery of priority species (considered likely to be those listed as species of principal importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006) is also listed as a requirement of planning policy.

In determining a planning application, planning authorities should aim to conserve and enhance biodiversity by ensuring that: designated sites are protected from harm; there is appropriate mitigation or compensation where significant harm cannot be avoided; measurable gains in biodiversity in and around developments are incorporated; and planning permission is refused for development resulting in the loss or deterioration of irreplaceable habitats including aged or veteran trees and also ancient woodland.

The Natural Environment and Rural Communities Act 2006 and the Biodiversity Duty

Section 40 of the Natural Environment and Rural Communities (NERC) Act 2006, requires all public bodies to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'biodiversity duty'.

Section 41 of the Act requires the Secretary of State to publish a list of habitats and species which are of 'principal importance for the conservation of biodiversity'. This list is intended to assist decision makers such as public bodies in implementing their duty under Section 40 of the Act. Under the Act these habitats and species are regarded as a material consideration in determining planning applications. A developer must show that their protection has been adequately addressed within a development proposal.

LOCAL PLANNING POLICY

The Natural Environment in Berkshire: Biodiversity Strategy 2014 – 2020 (adopted 2014)

BAP priority species found in Berkshire can be found here: <https://berkshirelnp.org/images/Biodiversity%20Strategy%20Small.pdf>

Wokingham Borough Local Development Framework (January 2010)

The Adopted Core Strategy can be viewed here: <https://www.wokingham.gov.uk/planning-policy/planning-policy-information/local-plan-and-planning-policies/>

CP7 – Biodiversity

Sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance.

Development:

- Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly.
- 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.

- That compromises the implementation of the national, regional, county, and local biodiversity action plans 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.
- Mitigation measures can be put in place to prevent damaging impacts.
- Appropriate compensation measures to offset the scale and kind of losses are provided.

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

A European Protected Species Licence (EPSL) issued by Natural England will be required for works likely to affect a bat roost or for operations likely to result in a level of disturbance which might impair their ability to undertake those activities mentioned above (e.g. survive, breed, rear young and hibernate). The licence is to allow derogation from the relevant legislation but also to enable appropriate mitigation measures to be put in place and their efficiency/success to be monitored. The legislation may also be interpreted such that, in certain circumstances, important foraging areas and/or commuting routes can be regarded as being afforded *de facto* protection, for example, where it can be proven that the continued usage of such areas is crucial to maintaining the integrity and long-term viability of a bat roost (Garland & Markham, 2008).

There are 17 species of bat breeding in England and Natural England issues licences under Regulation 55 of the Habitats Regulations to allow you to work within the law.

Licences are issued for specific purposes stated in the Regulations, if the following three tests are met:

- The purpose of the work meets one of those listed in the Habitats Regulations (see below);
- That there is no satisfactory alternative;
- That the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status (FCS) in their natural range

The Habitats Regulations permits licences to be issued for a specific set of purposes including:

5. include preserving public health or public safety or other imperative reasons of over-riding public interest including those of a social or economic nature and beneficial consequences of primary importance for the environment;
6. scientific and educational purposes;
7. ringing or marking; and,
8. conserving wild animals.

Development works fall under the first purpose and Natural England issues bat mitigation licences for developments.