

Bat Report



Aston Rise

On behalf of Mr & Mrs Lewsey

February 2025

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1 Executive Summary

Report purpose	This report identifies the assemblage of bats within the workshop (building B3) at Aston Rise, Aston, Oxfordshire, RG9 3DE (OS Grid Reference: SU 78271 84088), potential impacts of the proposals and mitigation, compensation and enhancement measures required.
Date and methods of survey	A Preliminary Roost Assessment and Daytime Bat Walkover of the workshop (B3) was conducted in March 2024 which identified the need for further surveys for bats including: three night time roost surveys (conducted June – August 2024).
Key findings	The site, situated in rural south Oxfordshire, is 2.2 ha in extent and includes three buildings; the main house (B1), annex (B2) and workshop (B3). A large residential garden is also present, containing several mature and semi-mature trees. Deciduous woodland (a priority habitat) surrounds the site on two sides. During the night time roost surveys of the workshop (B3), the following was recorded: • Three soprano pipistrelle and one common pipistrelle day/occasional roosts; • Three species of bat actively foraging and commuting within the site.
Potential impacts	The proposals include a Householder Application for the demolition of B3 and the construction of a new annex/garage building. In the absence of mitigation, development within the site may result in: • Permanent destruction of the common and soprano pipistrelle day roost; • The killing, injury or disturbance of roosting bats; and • Destruction of active bird nests.
Licensing	A bat licence is required from Natural England to allow the works to legally proceed.
Measures to avoid and/or reduce impacts and deliver biodiversity enhancements	The works will proceed adopting the mitigation measures specified within the bat licence application which include: • Safeguarding breeding birds • Registering the site under the Earned Recognition Scheme; • Erecting one bat box on a retained mature tree for use in case bats are found during works; • Undertaking a pre-commencement roost inspection; • Undertaking a soft-strip of any roof tiles that require removal under ecological supervision; • Integrating a bat box into the new building; • Utilising Bitumen 1F felt within the new roof rather than a modern breathable roofing membrane; • Incorporating two bat tiles within the roof; and • Ensuring sensitive use of artificial lighting.

2 Introduction

2.1 Background

- 2.1.1 Ecology by Design Ltd was commissioned by Mr & Mrs Lewsey to undertake Bat Night Time Roost Surveys of the workshop (building B3) at Aston Rise, Aston, Oxfordshire, RG9 3DE (central grid reference SU 78270 84092).

2.2 Site Description

- 2.2.1 The site is approximately 2.2 ha in extent. Buildings on site include the main house (B1), the annex (B2) and the workshop (B3). There is an area of deciduous woodland (Priority Habitat Inventory) in the east and west of the site, hardstanding in the northwest and centre of the site, residential garden in the north and the south of the site, and arable land in the south of the site.
- 2.2.2 The site is surrounded by arable fields to the north, south and west, with Priority Habitat deciduous woodland to the west of the site. In the wider landscape, the hamlet of Aston lies to the north and east of the site, arable land in all directions, and the River Thames to the north, east and west.

2.3 Proposed Works

- 2.3.1 The proposals include a Householder Application for the demolition of B3 and the construction of a new building and garage. There are additional applications for works to B1 and the demolition of B2 too.

2.4 Aims of Report

- 2.4.1 This report presents an appraisal of the potential impacts of the proposed development works of building B3 on bats. The report outlines recommendations for avoidance, mitigation, compensation and enhancement measures.

2.5 Personnel

- 2.5.1 This project is led by Senior Ecologist Oli Bulpitt BSc (Hons) MSc ACIEEM who has five years' experience in ecological consultancy. Oli is experienced in conducting habitat and protected species assessments of this size and nature. The Preliminary Roost Assessment survey was completed by Senior Ecologist Jo Sykes BSc (Hons) ACIEEM, who holds a Natural England Level 1 class licence for surveying bats (Licence number Level 1 - 2021-10092-CL17-BAT) and Assistant Ecologist Kat Hale BSc (Hons).

- 2.5.2 Project supervision and review of the report was provided by Associate Director Laura Grant, BSc (Hons), MCIEEM, who has been an ecological consultant for 17 years.

3 Methods

3.1 Desk Study

- 3.1.1 Records of bats were requested from Thames Valley Environmental Records Centre (TVERC) for within a 2km radius of central OS national grid reference SU 78270 84092. MAGIC (www.magic.gov.uk) was also used to identify presence of granted bat European Protected Species Mitigation licences within the local area.

3.2 Daytime Bat Walkover

- 3.2.1 A daytime bat walkover (DBW) survey was conducted by Jo Sykes (Natural England Level 1 - 2021-10092-CL17-BAT) and Kat Hale on 11th March 2024.
- 3.2.2 During the DBW the surveyors noted any habitats suitable for roosting, foraging or commuting bats within or adjacent to the site. This includes recording structures, habitat features and trees which could be suitable for bats.

Table 3.1: *Categorisation of Potential Suitability of Sites for Bats (Collins, 2023)*

Suitability	Description of Potential Flightpaths and Foraging Habitats
None	No suitable features for flightpaths and foraging.
Negligible	No obvious flightpath or foraging features but cannot be discounted.
Low	Habitats with limited connectivity suitable for use by low numbers of bats.
Moderate	High habitat connectivity including flightpath or foraging habitats features.
High	Well-connected habitats high quality habitats for foraging which is likely to be in regular use.

3.3 Preliminary Roost Assessment

- 3.3.1 An external and internal Preliminary Roost Assessment was conducted of the buildings on site, on the 11th March 2024.
- 3.3.2 The assessment was based on the guidance in Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023) and government guidance (Gov.uk., 2015a).
- 3.3.3 The surveyors used a high-power torch and binoculars to inspect features of interest. All external areas of the building were inspected as well as internal areas, including all lofts.
- 3.3.4 Evidence searched for included the presence of free hanging bats and bats within gaps and crevices, bat droppings, urine stains, rub marks, scratch marks and feeding remains.

Table 3.2: *Description of potential roosting habitats in structures*

Suitability	Description of potential roosting habitats in structures
None	No habitat features on site likely to be used by any roosting bats at any time of year (i.e. a complete absence of crevices/suitable shelter).
Negligible	No obvious habitat features on site likely to be used by roosting bats but cannot be discounted.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However these do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. maternity or classic hibernation site).
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, appropriate conditions and suitable surrounding habitat but unlikely to support a roost of high conservation status (i.e. maternity or classic hibernation site – roost type only, irrespective of species conservation status).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have potential to support high conservation status roosts (i.e. maternity or classic hibernation site).

3.4 Night Time Roost Surveys

- 3.4.1 Further survey was conducted to establish if bats are roosting within building as B3 which is assessed to be of low suitability for roosting bats during the PRA. One emergence surveys is required for low roost suitability to confirm presence or likely absence, in line with best practice guidelines.
- 3.4.2 Bat emergences were recorded from the building during the first survey, therefore, two further survey was carried out in order to take the total number of emergence surveys to three and to enable characterisation of the roosts present within the building.
- 3.4.3 Surveys were completed between June and August, in the suitable surveying season (May to September) with surveyors located around the building focused on potential roosting features.
- 3.4.4 The surveys undertaken within the site are detailed in Table 3.3.

Table 3.3: Night time roost survey details

Date	Surveyors	Type of Survey
25/06/2024	Jo Graham (Natural England Level 2 Class Licence 2018-36787-CLS-CLS), and Lauren Jones-Mullins.	Dusk emergence
17/07/2024	Jo Graham (Natural England Level 2 Class Licence 2018-36787-CLS-CLS) and Alix Harrington.	Dusk emergence
14/08/2024	Rachel Richards (Natural England Level 2 Class Licence 2023-11650-CL18-BAT) and Clare John	Dusk emergence

3.4.5 The surveys were based on the guidance included in the Bat Surveys for Professional Ecologists: Good Practice Guidelines (Collins, 2023). Bat detectors utilized included Elekon Batlogger M2 detectors to record any bats emerging from or re-entering the buildings.

3.4.6 The emergence surveys commenced approximately 15 minutes before sunset and lasted until 1.5 hours after sunset.

3.4.7 Surveyors were located on each aspect of the building, focused on features identified during the preliminary roost assessment as being suitable for roosting bats. During the surveys emergence and/or re-entry points were mapped, species were identified (where possible) and flight lines were noted. The results of the survey are detailed in Figure 2 in Appendix 2.

Two infrared cameras (Canon XA40 IR and Canon XA50 IR) and one thermal imaging camera were utilised during these surveys to better capture emergences, situated on the northern, western and southern elevation for each survey (see locations on Figure 2, Appendix 2). Camera footage was watched back for any suspected emergences/re-entries and also to confirm emergences/re-entries the surveyors recorded, to pin-point the specific emergence/re-entry locations.

Table 3.4: Dusk emergence survey methods

Date	Start and end times and time of sunset	Structure reference / location	Equipment used	Weather
25/06/24	21:10-22:55; 21:25	B3	Batlogger M & M2, Canon XA40 IR and Canon XA50 IR	Start: 25°C, Cloud 5/8 ¹ , Wind 1 ²

¹ Cloud cover is measured using the system called oktas. The visible sky is divided into eight and cloud presence is determined within each section. A value of one to eight is then assigned (1 okta being cloudless to 8 oktas being total cloud cover).

² The Beaufort scale is an empirical measure from 0-12 which relates wind speed to observed conditions. . 0- Calm, 1- Light air, 2- Light breeze, 3- Gentle breeze, 4- Moderate breeze, 5- Fresh breeze, 6- Strong breeze, 7- Moderate gale, 8- Fresh gale, 9- Strong gale, 10- Whole gale, 11- Storm, 12- Hurricane force.

				End: 20°C, Cloud 0/8, Wind 1
17/07/24	20:57-22:43; 21:13	B3	Batlogger M & M2, Canon XA40 IR and Canon XA50 IR	Start: 19°C, Cloud 7/8, Wind 0 End: 17°C, Cloud 4/8, Wind 1
14/08/24	20:12-21:57; 20:27	B3	Batlogger M & M2, Canon XA40 IR and Canon XA50 IR	Start: 19°C, Cloud 8/8, Wind 0 End: 16°C, Cloud 8/8, Wind 0

3.5 Limitations/Constraints

- 3.5.1 Surveyors were constrained by bright security lights around B3. The light on the northern elevation of B3 was on during the first survey, and off on the subsequent surveys. During the second survey it was noted that the automatically triggered light on the southern elevation of B2 was lighting the northern elevation of B3, directly onto the location of R1. The significance of these constraints was reduced by the positioning of the surveyor on the western elevation of B3 to cross reference emergence and activity information, as well as the use of cameras and analysis of the footage. Additionally, due to the motion sensor in the light on B2, there were large periods of time when the light was off during the second and third surveys.

4 Results and Interpretation

4.1 Desk Study

- 4.1.1 163 records of at least ten bat species have been recorded within 2km of the site including common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*), Nathusius' pipistrelle (*Pipistrellus nathusii*), brown long-eared bat (*Plecotus auritus*), noctule (*Nyctalus noctula*), serotine (*Eptesicus serotinus*), Daubenton's bat (*Myotis daubentonii*), Natterer's bat (*Myotis nattereri*), greater horseshoe (*Rhinolophus ferrumequinum*) and barbastelle (*Barbastella barbastellus*). The closest of these records was of a common pipistrelle, soprano pipistrelle, serotine, noctule, and *myotis sp.* bats 0.04km NE of the site in June 2022.
- 4.1.2 12 European Protected Species Licence (EPSL) for bats have been returned within 2km, with the closest for the destruction of a common pipistrelle breeding place in 2016, approximately 0.7km northeast of the site.

4.2 Daytime Bat Walkover

- 4.2.1 Habitats with suitability for foraging or commuting bats within or adjacent to the site include:
- The woodland within the east of the wider site.
 - The woodland adjacent to the western boundary of the site.
 - The scattered trees in the south of the wider site.
- 4.2.2 Habitats with suitability for roosting bats are discussed within the Preliminary Roost Assessment section below.
- 4.2.3 Overall, the site is identified as being of high suitability for bats.

4.3 Preliminary Roost Assessment

- 4.3.1 Table 4.1 includes descriptions of the building B3 within the site, any evidence of roosting bats found and an assessment of their suitability to support roosting bats. Figure 1 in Appendix 2 shows the locations of the loft voids in B3.

Table 4.1: *Suitability of buildings for roosting bats and summary of roosts found*

Building Reference	Description	Assessment
B3 'The Workshop'	B3 is a single storey workshop with a loft conversion. It is brick building with a clay-tiled, pitched gable ended roof. Weatherboarding is present on the exterior walls.	Low suitability for roosting bats

Externally, between 2% and 5% of the roof's tiles are lifted, broken or missing (PRF-10). This provides suitability for crevice dwelling species of bat. There were no gaps at the eaves and the ridges tiles appear to be in good condition.

Internally, the loft space has been completely converted with a minimal triangular loft cavity (approximately 20cm in height, 20cm in width and running the length of the building) remaining at the apex (L5), which was not accessible, providing no suitability for hanging species of bat.

4.4 Night Time Roost Surveys

- 4.4.1 Details of the night time roost surveys are given in Table 4.2 below, along with survey timings and weather conditions. The locations of the surveyors and the roosts present is given in Figure 2 in Appendix 2.

Table 4.2: Survey weather conditions

Date	Sunset/ Sunrise	Start	End	Weather
25 th June 2024	21:25	21:10	22:55	25°C to 20°C, Cloud 5/8 to 0/8, 2 Beaufort
17 th July 2024	21:13	20:57	22:43	19°C, Cloud 7/8, 0 Beaufort
14 th August 2024	20:27	20:12	21:57	19°C, Cloud 8/8, 0 Beaufort

Dusk emergence survey 25th June 2024

- 4.4.2 One common pipistrelle emergence was observed from the building, from under the bargeboard on the northern elevation of the building (R1) next to a security light. This bat emerged originally at 21:19, then re-entered the roost at 21:38, then exited the roost again at 21:47.
- 4.4.3 Common and soprano pipistrelles were also heard and observed commuting through and foraging within the survey area throughout the survey window, with several commuting passes of noctule also noted.

Dusk emergence survey 17th July 2024

- 4.4.4 No emergences were noted during this survey of B3, with no bats noted to be emerging or re-entering R1. The first bat was a common pipistrelle recorded commuting east to south around B3 at 21:13. Common and soprano pipistrelles were heard and observed commuting through and foraging throughout the survey, with several commuting passes of noctule also noted. Five

passes of serotine were observed within the wider site during the later part of the survey (22:24).

- 4.4.5 Notably, a motion sensor security light on the southern elevation of B2 was on intermittently during the survey and was shining directly onto R1.

Dusk emergence survey 14th August 2024

- 4.4.6 Four bats were observed to emerge from B3, including:
- One soprano pipistrelle from the bargeboard on the northern gable end of B3 (R2) at 20:36
 - One soprano pipistrelle from the apex of the northernmost dormer window (R3) at 20:43
 - Two soprano pipistrelle from the eaves of the northern gable end of B3 (R4) at 20:50
- 4.4.7 A soprano pipistrelle was observed making multiple false approaches to R3 at 20:36 but did not make a re-entry during the survey.
- 4.4.8 The first bat was a soprano pipistrelle recorded in the area at 20:23. Common pipistrelle, soprano pipistrelle, noctule, and serotine bats were all observed commuting through and foraging within the site during the survey.

4.5 Site/ Species Valuation for Bats

- 4.5.1 Table 4.3 below summarises the roosts present on site and their relative geographical importance in line with criteria set out in Appendix 3 (Reason & Wray, 2023).

Table 4.3: Summary of Roosts on Site and their Geographic Importance

Roost Reference	Species	Roost Type	Peak Count	Geographic Importance
R1	Common pipistrelle	Non-breeding day roost	1	Site
R2	Soprano pipistrelle	Non-breeding day roost	1	Site
R3	Soprano pipistrelle	Non-breeding day roost	1	Site
R4	Soprano pipistrelle	Non-breeding day roost	2	Site

- 4.5.2 The roosts on site comprise three soprano pipistrelle roosts and one common pipistrelle roost, both of which are common and widespread species. The common pipistrelle and soprano

pipistrelle non-breeding day roosts across the building (R1 – R4) are assessed to be of site importance due to the nature of the roosts and as the species present are widespread. The assemblage of species of site score 6, using table 3.3 from the Bat Mitigation Guidelines (2023) indicating that they are not of county, regional or national importance, as these species are widespread.

5 Potential Impacts and Recommendations

5.1 Bats

5.1.1 The proposed demolition of B3 will result in the loss of Roosts R1-R4. In the absence of mitigation, this may kill or injure bats present within the roost during the works and will result in the permanent destruction of this roost. Though the construction of the proposed new annex building with a garage will disrupt the flight paths noted on site, the woodland to the east and south of the building is considered to provide better commuting suitability and therefore the impacts is not considered significant.

5.1.2 There is also potential for bats within roosts on site to be disturbed during the working phase of the project, for example, noise and vibration of works within the building and/or temporary blockage of roost flightlines by scaffolding externally.

Recommendation R1: Secure and Implement Bat licence

5.1.3 Any development works that could affect a bat or bat roost as described by the relevant legislation can only be permitted under a mitigation licence from Natural England.

5.1.4 To proceed with this development, the site should be registered under the Earned Recognition scheme. This allows qualifying sites to be registered within 15 working days once planning permission is secured. As the roosts on this site are of low conservation significance, this project qualifies for inclusion into this scheme.

5.1.5 When considering whether to grant permission the local planning authority must consider the likelihood of a Natural England licence being granted. In doing so, it must consider three tests:

- Are there imperative reasons of overriding public interest why the proposed development / operation should be undertaken?
- Are there any satisfactory alternatives? and
- Will the proposals be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range?

5.1.6 Without mitigation, works could result in killing and/or injury of common pipistrelles and soprano pipistrelles and permanent loss of four roosts. There could also be disturbance during works by noise, vibration and dust.

Recommendation R1

5.1.7 Four confirmed day roosts are present in the building and the mitigation strategy will follow the below approach:

- Registering the site under the Earned Recognition Scheme;
- Erecting one bat box on a retained mature tree for use in case bats are found during works;
- Undertaking a pre-commencement roost inspection;
- Undertaking a soft-strip of any roof tiles that require removal under ecological supervision;
- Integrating a bat box into the new building;
- Utilising Bitumen 1F felt within the new roof rather than a modern breathable roofing membrane;
- Incorporating two bat tiles within the roof; and
- Ensuring sensitive use of artificial lighting.

5.1.8 It is possible to undertake the works at any time of year once the site has been registered under the Earned Recognition scheme. However, it is recommended any roof stripping works impacting confirmed roosts are carried out at the beginning of the bat active season (March/April) or at the end of the season (September-November) if possible, when bats are least prone to disturbance. That is to avoid both the hibernation and maternity periods, as carrying out works during December-February and May-August has a higher risk of encountering either hibernating individuals or maternity roosts respectively.

5.1.9 A site inspection by an ecologist must be undertaken within three months of applying to register the site. Prior to works commencing, all staff on site will be made aware of the mitigation strategy and the level of protection afforded to bats through provision of an on-site 'toolbox talk' by a licensed ecologist.

5.1.10 The ecologist will supervise the removal by hand of tiles to be removed. In the event any bats are found they will be relocated to a bat box erected on a nearby tree. Once all necessary tiles and any other features suitable for bats have been removed, the remaining works can progress without ecological supervision.

5.1.11 In total, two bat boxes and two bat tiles (to provide external crevice features) will be incorporated for roost creation. The bat boxes must be placed at a height of 3m – 5m, on southern or western aspects of the building, unobscured by vegetation. The bat tiles may only be used with bitumen felt as a lining. Further details including specifications are detailed in Appendix 3.

5.1.12 Increased levels of artificial light can cause disturbance to bats. Though several bat species can take advantage of artificial lighting systems for foraging, feeding off the insects they attract, other species avoid them as foraging within an illuminated area increases the risk of predation by nocturnal birds of prey or even domestic cats. If lighting is intensive and widespread,

particularly lighting from lamps, which emit UV light (such as mercury vapour); it can deter some bats from utilising the site and in some instances can act as a barrier across commuting lines. Research has also shown that certain types of artificial lighting have been proven to disturb the emergence patterns of bats when they are placed within the vicinity of entrances to a bat roost.

Recommendation R2: Lighting

5.1.13 Any lighting for the development (if required) will need to be included, it should be sensitively designed, adopting the following principles:

- Maintaining the existing lighting conditions of the surrounding garden to avoid potential fragmentation of roosts from the surrounding habitats; and
- Not illuminating any newly created roosting features (i.e. bat boxes).

5.1.14 Where lighting is required, ensuring:

- Light levels are less than 3 Lux;
- LED luminaires with a warm white spectrum ideally <2700Kelvin (to avoid blue / UV elements);
- Bollard or low-level downward directional luminaires are used and mounted on the horizontal (with no upward tilt); and
- Security lighting, if required, is motion-activated with short (1 minute) timers.

5.2 Nesting birds

5.2.1 The proposals will result in the demolition of the existing building that may be suitable for nesting birds. This would result in a contravention of relevant wildlife legislation if active nests are present. In the absence of mitigation measures, this would be considered to represent an adverse ecological impact of significance within a local context.

Recommendation R3: Safeguarding Nesting Birds

5.2.2 Any wild birds' nests are protected whilst in use. If any active wild birds' nests are found prior to the building demolition, then these must be left alone until they cease to be in use. Ideally, works to suitable nesting habitat/features should be scheduled to avoid the bird nesting season (March to August inclusive). Should such works take place during March-August inclusive, they must be immediately preceded by a check for any active nests by a suitably qualified ecologist. Any active nests identified during works (regardless of time of year) would need to be protected and left with a suitable buffer (to be defined by the ecologist) until the nest is no longer active.

6 Relevant Legislation and Policy

6.1 Exit from European Union

- 6.1.1 The Conservation of Habitats and Species Regulations 2017 (as amended), referred to as the '2017 Regulations,' are one of the pieces of domestic law that transposed the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives). Changes to the 2017 Regulations have been made by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 (referred to as the '2019 Regulations') to transfer functions from the European Commission to the appropriate authorities in England and Wales.
- 6.1.2 The amendments prescribed by the 2019 Regulations allow existing protections afforded by current wildlife legislation and transposed EC Council Directives to be operable from 01 January 2021.
- 6.1.3 The 2019 Regulations protect rare and vulnerable birds and the habitats that they depend upon. This is achieved in part through the classification of Special Protection Areas (SPAs). The Habitats Directive aims to protect plants, habitats and animals other than birds. This is achieved in part through the creation of Special Areas of Conservation (SACs). SPAs and SACs are collectively referred to as the 'National Site Network'.
- 6.1.4 Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the National Site Network, however, all Ramsar sites remain protected in the same way as SACs and SPAs.

6.2 National Planning Policy Framework

- 6.2.1 The National Planning Policy Framework (NPPF) was updated in December 2024 (MHCLG, 2024) thereby replacing the older version of December 2023.
- 6.2.2 In relation to planning for climate change, para 162 states: Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating and drought from rising temperatures. Policies should support appropriate measures to ensure the future health and resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
- 6.2.3 In relation to planning and flood risk, para 182 states 'Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates

and reduce volumes of runoff, and which are proportionate to the nature and scale of the proposal. These should provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity, as well as benefits for amenity. Sustainable drainage systems provided as part of proposals for major development should:

- a) take account of advice from the Lead Local Flood Authority;
- b) have appropriate proposed minimum operational standards; and
- c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development.'

6.2.4 The new framework sets out in section 15 that planning policies and decisions should contribute to and enhance the natural and local environment by ... (d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs (Para 187).

6.2.5 To protect and enhance biodiversity and geodiversity (Para 192), plans should:

- identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
- promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

6.2.6 When determining planning applications, local planning authorities should apply the following principles (Para 193):

- if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.

6.2.7 The following should be given the same protection as habitats sites (Para 194):

- potential Special Protection Areas and possible Special Areas of Conservation;
- listed or proposed Ramsar sites; and
- sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

6.2.8 The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site (Para 195).

6.3 Protection of Bats

6.3.1 Bats and their roost sites are protected by UK legislation.

6.3.2 The Wildlife and Countryside Act (1981) (as amended) makes it an offence to:

- Intentionally kill, injure or take a bat;
- Possess or control any live or dead specimen or anything derived from a bat;
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a bat; and
- Intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for that purpose.

6.3.3 Additionally, The Conservation of Habitats and Species Regulations 2017 (as amended) make it an offence to:

- Deliberately capture or kill a bat;
- Deliberately disturb¹ a bat;
- Damage or destroy a breeding site or a resting place of a bat; and

- Keep, transport, sell or exchange or offer for sale or exchange a live or dead bat or any part of a bat.

6.3.4 ¹Disturbance 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.

6.4 Local Planning Policy

6.4.1 The Wokingham Borough Local Development Framework Adopted Core Strategy Development Plan Document was adopted in January 2010. The following policies may be of some relevance to this development.

CP7 – Biodiversity

6.4.2 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.

6.4.3 Development:

- A. Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly, or
- B. 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, or
- C. 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, and:
 - i. Mitigation measures can be put in place to prevent damaging impacts; or

- ii. Appropriate compensation measures to offset the scale and kind of losses are provided.

7 References

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Appendix 1 - Photographs

Photograph 1: Western Elevation of B3



Photograph 2: Ground floor interior of B3 (view from northern elevation access)



Photograph 3: Condition of roofing tiles of B3



Photograph 4: Northern elevation of the workshop (B3) with indications of where roost were present.



Appendix 2 - Figures

Next page:

- Figure 1: EBD_3725_DR006 - B3 emergence Survey Results
- Figure 2: EBD_3725_DR007 B3 Loft Plan



- LEGEND
- Site boundary (1.33 ha)
 - Surveyor Locations - B3
 - Commuting and foraging bat flightlines
 - Common pipistrelle roost
 - Soprano pipistrelle roost
 - Buildings - B3



Project:
Aston Rise, Henley-on-Thames

Client:
Spreatley & Partners

Drawing Title:
Emergence Survey Results

Drawing No.: EBD_3725_DR005	Scale (@A3): 1:100
Central Eastings, Northings: 478284, 184055	Date Drawn: 10/02/2025
Drawn by: JE	Approved by: BG

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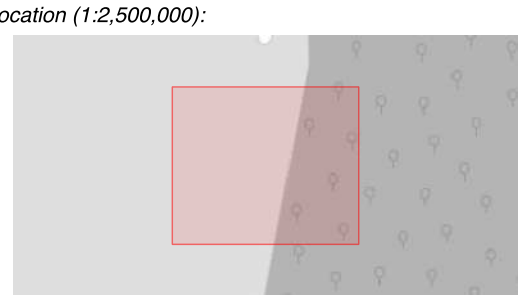
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- LEGEND
- Site Boundary (1.33 ha)
 - PRFs - B3
 - Lofts - B3
 - Buildings B3



Project:
Aston Rise, Henley-on-Thames

Client:
Spreatley & Partners

Drawing Title:
B3 Loft Plan

Drawing No.: EBD_3725_DR007	Scale (@A3): 1:75
Central Eastings, Northings: 478287, 184054	Date Drawn: 11/02/2025
Drawn by: KH	Approved by: BG

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Appendix 3 - Valuing Bat Roosts

The table below is a copy of Table 3.2 and Table 3.3 of the Bat Mitigation Guidelines (Reason and Wray, 2023) assessing the importance of roosts.

Roost category: note this table relates to VALUATION and does not mean that all such sites are 'places of shelter' as referenced in the W6CA or Habitats Regulations. Inclusion in this table does not indicate that a licence <u>would</u> be required; this would be driven by roost status, any impacts and the likelihood of an offence.							
Conservation status/ distribution	Feeding perches; night-roosts; Individual or very small occasional/ transitional/ opportunistic roosts	Non-breeding day roosts (small numbers of species)	Mating sites (excluding individual trees and larger swarming sites); small numbers of hibernating bats	Larger transitional roosts	Hibernation sites ^d	Autumn swarming sites [largely, vesper species which hibernate underground]	Maternity sites ^e
Widespread all geographies	Site	Site	Site	Site/Local	District/County [Larger hibernation sites rare in the UK]	District/County [Very large pipistrelle swarming sites as yet unknown in the UK91, but see Section 6.7]	Unlikely to exceed District importance unless colonies are atypically large; importance increased for assemblages.
Widespread in many geographies, but not as abundant in all	Site	Site	Site, dependent on local distribution [For <i>Myotis</i> , see swarming site column]	District	District/County importance dependent on size ^a and number of species	County/Regional importance dependent on size ^a ; importance increased for larger sites that serve larger numbers/species	Unlikely to exceed County importance unless colonies are atypically large; importance increased for assemblages.
Rarer or restricted distribution	Site (very well-used night roosts may be of District importance for some species)	Site/Local/District, dependent on local distribution	Site/Local/District, dependent on local distribution	District	District/County importance dependent on size ^a and local distribution; increased value for assemblages.	County/Regional importance on size and local distribution; increased value for assemblages.	County/Regional importance on size and local distribution; increased value for assemblages.
Rarest Annex II species and very rare	Site (very well-used night roosts may be of District importance for some species)	Site/Local/District, dependent on local distribution	Site/Local/District, dependent on local distribution	District	County/Regional importance on size ^a and local distribution; increased value for assemblages	County/Regional importance on size and local distribution; increased value for assemblages.	County/Regional importance on size ^a and local distribution' increased value for assemblages.

Rarity category [points/species]	South-west England & South Wales		Southern England		South-eastern/East Anglia to The Wash		North/mid-Wales		Central England/Mid-lands	
Widespread all geographies [score 1]	<i>Ppip</i> <i>Ppyg</i> <i>Paur</i>	Score 3	<i>Ppip</i> <i>Ppyg</i> <i>Paur</i>	Score 3	<i>Ppip</i> <i>Ppyg</i> <i>Paur</i>	Score 3	<i>Ppip</i> <i>Ppyg</i> <i>Paur</i>	Score 3	<i>Ppip</i> <i>Ppyg</i> <i>Paur</i>	Score 3
Widespread in many geographies, but not as abundant in all [score 2]	<i>Mmys</i> <i>Mbra</i> <i>Mdau</i> <i>Mnat</i> <i>Nnyc</i>	Score 10	<i>Mmys</i> <i>Mbra</i> <i>Mdau</i> <i>Mnat</i> <i>Nnyc</i>	Score 10	<i>Mdau</i> <i>Mnat</i> <i>Nnyc</i>	Score 10	<i>Mmys</i> <i>Mbra</i> <i>Mdau</i> <i>Mnat</i> <i>Nnyc</i>	Score 10	<i>Mmys</i> <i>Mbra</i> <i>Mdau</i> <i>Mnat</i> <i>Nnyc</i>	Score 10
Rarer or restricted distribution [score 3]	<i>Rhip</i> <i>Eser</i> <i>Nlei</i> <i>Pnat</i>	Score 12	<i>Malc</i> <i>Eser</i> <i>Nlei</i> <i>Pnat</i>	Score 12	<i>Mmys</i> <i>Mbra</i> <i>Eser</i> <i>Nlei</i> <i>Pnat</i>	Score 15	<i>Rhip</i>	Score 3	<i>Eser</i> <i>Nlei</i> <i>Pnat</i>	Score 9
Rarest Annex II species and very rare [score 4]	<i>Rfer</i> <i>Mbec</i> <i>Bbar</i> <i>Paus</i>	Score 16	<i>Rfer</i> <i>Rhip</i> <i>Mbec</i> <i>Bbar</i> <i>Paus</i>	Score 20	<i>Bbar</i>	Score 4		Score 20		Score 4
Thresholds	Maximum possible	41	Maximum possible	45	Maximum possible	28	Maximum possible	36	Maximum possible	26
County importance threshold: 45%	County	18	County	20	County	13	County	16	County	12
Regional importance threshold: 55%	Regional	23	Regional	25	Regional	15	Regional	20	Regional	14
National importance threshold: 70%	National	29	National	32	National	20	National	25	National	18

Appendix 6 – Mitigation and/or Enhancement Measures

Products	Description
	Bat access tile set A tile shaped to provide an access point for bats under roofing tiles. These are of most benefit to crevice dwelling species but can also provide access to the roof void for free-hanging species. <u>Bitumen 1f type felt must be used in roofs fitted with these tiles and a hole should be cut into the felt beneath the tile to allow access to the roof cavity.</u> Available in a range of materials and colours. https://www.nhbs.com/bat-access-tile-set
	2F Schwegler Bat Box (or similar) A standard bat box for smaller bats to be placed on a mature tree. http://www.nhbs.com/2f-schwegler-bat-box-general-purpose