

**113A Nine Mile Ride
Wokingham
Berkshire
RG40 4HX**

Preliminary Roost Assessment

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Report Quality Control Information	
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1 EXECUTIVE SUMMARY

- 1.1.1** John Wenman Ecological Consultancy LLP was instructed by Douglas King to undertake a Preliminary Roost Assessment (PRA) for bats at 113A Nine Mile Ride in Wokingham, Berkshire. The survey was commissioned to accompany a future householder planning application to be submitted to Wokingham Borough Council seeking consent to enlarge the first floor accommodation and demolish the detached garage.
- 1.1.2** Approximately 200-250 medium-sized bat droppings of a shape and size most typical of those deposited by the void-dwelling long-eared bat species (*Plecotus sp.*) were observed within the roof void. Externally the property had multiple potential roost features suitable for use by crevice-dwelling bats such as pipistrelle (*Pipistrellus spp.*) and small *Myotis* species. The potential roosting sites were located under lifted roof tiles, behind hanging tiles, and between gaps in tile mortar. These features could provide sufficient space, shelter, protection and conditions for regular use by individual or small non-breeding groups of crevice-dwelling bats, such as the locally recorded common pipistrelle (*Pipistrellus pipistrellus*). The number of droppings observed suggests the property is used by an individual or small number of non-breeding long-eared (*Plecotus spp.*) bats. The property has a confirmed roost within the roof void with a risk of regular use by a large number of void-dwelling bats, as well as moderate suitability for crevice-dwelling bats externally. The garage was of low suitability for crevice-dwelling bats.
- 1.1.3** The development proposals will directly impact the potential roost features identified. Furthermore, works could obstruct access to and result in the damage/destruction of bats roosts and lead to direct/indirect disturbance, injury and/or death of bats, which may have the potential to significantly affect the local distribution or abundance of a bat species.
- 1.1.4** If the proposed works cannot be altered to avoid the potential adverse effects on bats in the dwelling, further surveys are recommended to establish the presence or absence of bat roosts, to be able to assess fully whether the development proposals will have an adverse effect on bats and design a mitigation strategy if necessary. A minimum of three dusk emergence survey visits should be undertaken in the period of May to September, with at least two surveys between May and August. The features on the garage should be thoroughly investigated using an endoscope. Should evidence be found or a full inspection of all crevices is not possible, a minimum of one dusk emergence survey visit should be undertaken for the garage in the period of May to August.
- 1.1.5** This report contains information regarding a mobile species so it will likely be valid for less than 12 months (CIEEM 2019b).

2 INTRODUCTION

2.1 Project Background

2.1.1 John Wenman Ecological Consultancy LLP was instructed by Douglas King to undertake a Preliminary Roost Assessment (PRA) for bats at 113A Nine Mile Ride in Wokingham, Berkshire.

2.1.2 The survey was commissioned to accompany a future householder planning application to be submitted to Wokingham Borough Council seeking consent to enlarge the first floor accommodation and demolish the detached garage.

2.2 Site Location and Context

2.2.1 The property is a detached residential dwelling located on the northern side of Nine Mile Ride, in a suburban area southwest of Wokingham (central OS grid reference: SU 78856 64729).

2.2.2 The property is neighboured by similar properties with associated private gardens. The wider surroundings consist of open arable and pastoral farmland with established hedgerows and priority habitat ancient woodland. Longmore Lake is situated less than 300 metres to the northwest of the property.

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 the 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 property was undertaken on the 14th October 2025 by ecologist Jake Morgan - a Qualifying member of CIEEM - registered under Natural England Bat Survey Class Licence CL17 (Registration no. 2025-80417-SCI-CL17) and ecologist Verity West – a Qualifying member of CIEEM, in accordance with good practice guidance (Collins 2023). The equipment used during the inspection comprised binoculars, a high-power (1 million candlepower) LED torch, a headtorch, ladder and PPE (facemask, gloves etc.). The inspection involved a systematic search of the exterior and interior of the structure during daylight hours to compile information on potential and actual bat access points; potential and actual bat roost sites; and any evidence of bat presence.

External Survey

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

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

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

building.

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

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

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

Internal Survey

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

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

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

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

- the apex of the gable end or dividing walls;

- the top of chimney breasts;
- ridge and hip beams;
- mortise and tenon joints;
- behind purlins; and
- between tiles and roof lining.

Survey Limitations and Validity

- 4.2.9** There were no significant survey limitations because PRAs can be carried out at any time of year under any weather conditions and the building was fully accessible.
- 4.2.10** It should be noted that it is not always possible to inspect all potential roost sites during a survey, particularly for bat species which typically roost in hidden crevices. Therefore, an absence of bat evidence found during a survey does not necessarily equate to evidence of bat absence in a building.
- 4.2.11** This report contains information regarding a mobile species so it will likely be valid for less than 12 months (CIEEM 2019b).

5 SURVEY RESULTS

5.1 Desk Study

- 5.1.1** The linked gardens in the immediate suburban setting resembles continuous habitat that could be used as flight paths connecting to high-quality foraging habitats in the nearby countryside such as open pastoral farmland with established hedgerows, ancient woodland, and Longmoor Lake, for any bats roosting locally.
- 5.1.2** Bat mitigation licences that have been granted inside a 2 kilometre radius of the property, within the last 10 years, are detailed in **Table 1** below.

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

Case Reference of Granted Licence	Species on the Licence	Licensable Period	Licensable Works	Approx Distance (m)
2015-18339-EPS-MIT	Common pipistrelle	01/02/2016 to 31/01/2021	Destruction of a resting place	366 W
2014-3970-EPS-MIT	Common pipistrelle Brown long-eared	29/10/2014 to 29/06/2022	Damage of resting place	658 E
2015-7687-EPS-MIT	Common pipistrelle Brown long-eared	25/08/2015 to 31/08/2020	Destruction of a resting place	658 E
2015-9568-EPS-MIT	Common pipistrelle	06/05/2015 to 30/04/2020	Destruction of a resting place	870 NE
2014-4890-EPS-MIT	Brown long-eared	23/03/2014 to 31/12/2015	Damage of resting place	1000 E
2015-7094-EPS-MIT	Common pipistrelle Brown long-eared	06/03/2015 to 31/03/2015	Destruction of a resting place	1000 E
2019-39174-EPS-MIT	Common pipistrelle Soprano pipistrelle Brown long-eared	13/03/2019 to 13/03/2029	Damage of a breeding roost and resting place	1265 SE
2016-24999-EPS-MIT-1	Common pipistrelle Soprano pipistrelle	12/09/2016 to 16/02/2027	Destruction of a breeding roost and resting place	1565 NW
2019-44291-EPS-MIT	Common pipistrelle Soprano pipistrelle	17/03/2020 to 31/12/2020	Damage of resting place	1740 SE
2015-7589-EPS-MIT	Common pipistrelle Soprano pipistrelle Brown long-eared Natterers, Serotine	18/08/2015 to 31/08/2025	Destruction of a resting place	1775 W
2016-22331-EPS-MIT	Common pipistrelle Soprano pipistrelle Brown long-eared Natterers	21/04/2016 to 30/04/2026	Destruction of a resting place	1880 W
2019-40646-EPS-MIT	Nathusius' pipistrelle	22/05/2019 to 19/05/2024	Destruction of a resting place	1875 SE
2014-3612-EPS-MIT	Soprano pipistrelle	24/10/2014 to 22/10/2019	Destruction of a resting place	1908 E

- 5.1.3** No previous bat roost assessment reports were available for 113A Nine Mile Ride on the Wokingham Borough Council planning portal or from the client.

5.2 Building Inspection

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

External Survey

- 5.2.2** The property was a detached, brick-built residential bungalow with a detached garage. The hipped roof included three dormers and two interlocking gables (**Photographs 1 - 2**).



Photograph 1. Front of property viewed from south.



Photograph 2. Rear of property viewed from north.

- 5.2.3** The flat roof tiles were mostly intact, with occasionally lifted tiles in the roof valleys and along the verges. The verge mortar was partially crumbling along the northern gables. The hip tiles along the front elevation were intact (**Photographs 3 – 6; Target notes 1 - 4**).



Photograph 3. Roof tiles mostly flat.



Photograph 4. Gaps under lifted verge tiles and in roof valleys (**TN3-4**).



Photograph 5. Gaps between the verge mortar and uPVC bargeboard (**TN1**).



Photograph 6. Gaps in verge mortar (**TN2**).

- 5.2.4** Occasionally lifted hanging tiles were situated across the front and rear gable ends, with further gaps along the edges of the gables. The three dormer windows along the west and east elevations were also clad with hanging tiles which were lifted in multiple places with

further gaps along their edges. There were also gaps within the dormer mortar
(**Photographs 7 - 10; Target notes 5 - 8**).



Photograph 7. Lifted hanging tiles on gable ends lifted in places (TN5-6).



Photograph 8. Gaps at edges of gable end hanging tiles (TN5-6).



Photograph 9. Lifted hanging tiles on dormers (TN7).

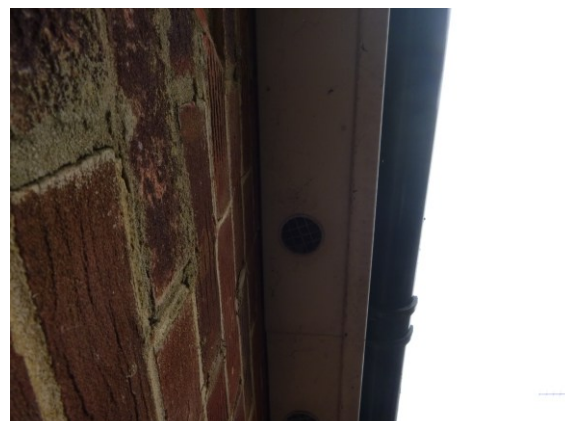


Photograph 10 Gaps in dormer mortar (TN8).

5.2.5 There were gaps under roof tiles around the skylight on the front elevation. The uPVC soffits were tight to the brickwork along all elevations (**Photographs 11 – 12; Target Note 9**).



Photograph 11. Gaps around skylight (TN9).



Photograph 12. Soffits tight to brickwork.

5.2.6 The detached single-skin brick garage had a flat bitumen roof with a small section of clay roof tiles on the front elevation, which were lifted at the eastern end (**Photographs 13 - 14; Target notes 10 - 11**).



Photograph 13. Flat roof garage (TN10).



Photograph 14. Lifted tiles at one end of garage roof tiles (TN11).

Internal Survey

- 5.2.7** The property had a small eaves void opening up to a larger area in the southern gable. The roof was lined with bitumen reinforced liner which had occasional tears on the gable end where hanging tiles were visible. The floor was covered in fibreglass and polystyrene chip insulation and boarded in places. The eaves were free from insulation and daylight was visible at the southern gable. The ridge was free from cobwebs. Approximately 200-250 medium-sized bat droppings were present throughout the void, with the highest concentration corresponding to gaps in the roof liner and around the southern gable. There was a small inaccessible void to the east of the roof void, which was lined with intact plastic roof liner, where no evidence of bats droppings were visible (**Photographs 15 – 24; Target notes 12 - 15**).



Photograph 15. Eaves void with fibreglass insulation.



Photograph 16. Void opening to southern gable.



Photograph 17. Bitumen reinforced liner, with occasional tears (TN12).



Photograph 18. Insulated and part boarded floor.



Photograph 19. Eaves open.



Photograph 20. Medium-sized bat droppings.



Photograph 21. Medium-sized bat droppings

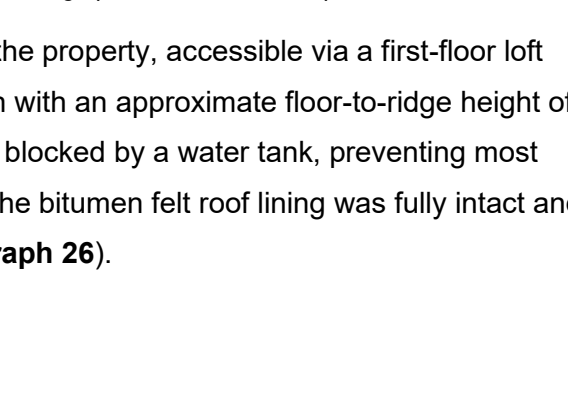


Photograph 22. Medium-sized bat droppings.



Photograph 23. Medium-sized bat droppings.

Photograph 24. Plastic liner in places.



5.2.8 A void was situated along the central ridge of the property, accessible via a first-floor loft hatch. The void was of cut & pitch construction with an approximate floor-to-ridge height of 0.25 metre and the access hatch was partially blocked by a water tank, preventing most access (**Photograph 25**). Where accessible, the bitumen felt roof lining was fully intact and the void was cobwebbed throughout (**Photograph 26**).



Photograph 25. Access limited by water tanks.



Photograph 26. Fully intact bitumen felt along the ridge.

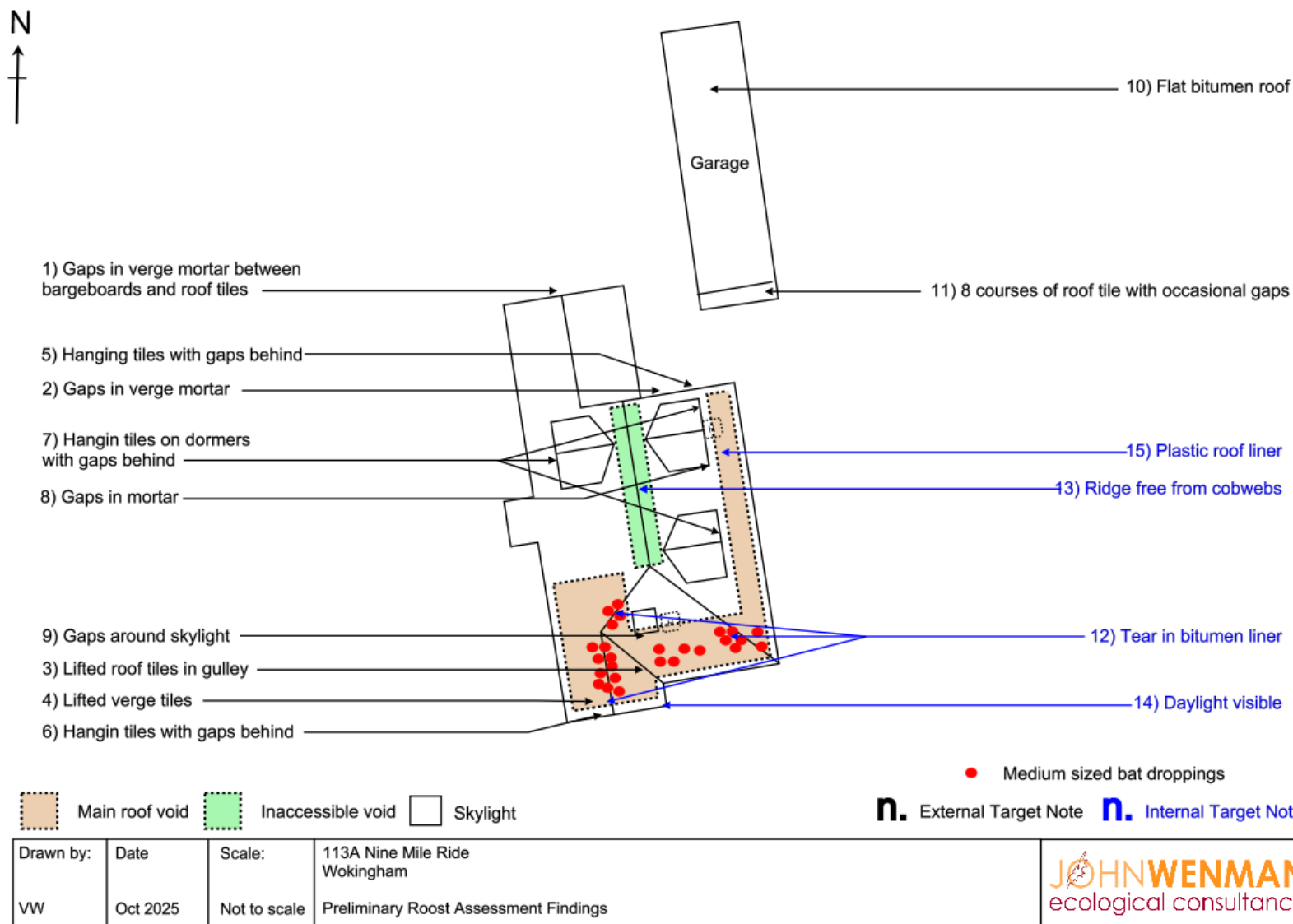


Figure 1. Preliminary Roost Assessment Survey Findings

6 DISCUSSION

6.1 Assessment of Potential Roost Suitability

6.1.1 The surrounding suburban setting with linked residential gardens provides habitats that could be used as flight paths and feeding habitat for any bats roosting locally, also connecting to high-quality foraging habitats in the nearby landscape such as open arable and pastoral farmland with established hedgerows, woodland and Longmoor Lake. The search of granted bat mitigation licences identified six species known to be roosting within a 2km radius of the property: common pipistrelle (*Pipistrellus pipistrellus*) soprano pipistrelle (*Pipistrellus pygmaeus*), brown long-eared (*Plecotus auritus*), Nathusius' pipistrelle (*Pipistrellus nathusii*), Natterer's (*Myotis nattereri*) and Serotine (*Eptesicus serotinus*).

6.1.2 As evidence of roosting bats was found internally, it is confirmed that the void supports primarily void-dwelling bat species such as the long-eared bat species (*Plecotus* spp.).

6.1.1 The property and garage had the following potential bat access points and crevice roosting opportunities;

- Gaps in verge mortar (**Photographs 5 & 6: Target notes 1 & 2**),
- Under lifted roof tiles (**Photographs 3 & 4; Target notes 3 & 4**)
- Behind hanging tiles (**Photographs 7 - 9 ; Target notes 5 - 7**)
- Gaps around the dormers (**Photograph 10 ; Target note 8**)
- Gaps around skylight (**Photographs 11; Target note 9**),
- Gaps under lifted tiles on garage (**Photograph 12; Target note 11**).

6.1.2 All features associated with the main property directly lead inside the roof void, which was of a suitable size and condition for void dwelling bats, such as the locally recorded brown long-eared (*Plecotus auritus*). Where the roof lining is intact, there are potential crevice roost sites for crevice-dwelling bats such as the locally recorded common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*). Evidence of crevice-roosting species is typically hidden from view in areas such as gaps between tiles and internal linings/insulation.

6.1.3 Considering the evidence within the void, potential crevice roost features and surrounding habitats, the property is considered to have a confirmed void-dwelling roost and is of moderate potential suitability for crevice-dwelling bats. The garage is

considered to have low suitability for crevice-dwelling bats (see **Appendix 1** for potential suitability categories)

6.2 Assessment of Potential Roost Status

- 6.2.1** The observation of approximately 200 – 250 medium-sized bat droppings, resembling those typically deposited by long-eared species (*Plecotus* spp.), within the eave space of the property indicates that the property has likely been used regularly by an individual or low numbers of brown long-eared bat (*P. auritus*) on an occasional basis, i.e. a confirmed bat roost. However, in consideration of the sufficient space, shelter, protection and conditions of the void as well as the surrounding habitat, the building may be suitable for regular use by large numbers of bats more regularly and for longer periods of time. The distribution of droppings indicates that the bat access points are likely to be via the southern gable, gaps around the skylight or features associated with the roof tiles across the southern elevation. Internal access is likely via the southern gable or torn sections of roof lining where the hips and ridge connect.
- 6.2.2** The brown long-eared bat (*P. auritus*) is a widespread species in Great Britain, commonly associated with broadleaved and mixed woodland habitats. This species will roost in trees, bat boxes and buildings but maternity roosts are predominantly located in barns, churches and houses with large internal flight spaces (Mathews et al. 2018). Roosts supporting these species hold site to county level conservation importance subject to the roost type (see Appendix 2 for definitions of roost types), i.e. non-breeding roosts supporting individual bat or small groups through to maternity roosts supporting large numbers of female bats (Reason & Wray 2025). The grey long-eared bat (*P. austriacus*) is very similar in morphology and flight pattern to the brown long-eared bat (*P. auritus*) but very few colonies are known in Great Britain; this species is found almost exclusively in lowland regions of southern England, near to the coast (Mathews et al. 2018).
- 6.2.3** The crevice roost sites that were distributed across all elevations of the bungalow as well as the front of the garage are considered to be suitable for use by typically crevice-dwelling bat species such as the abundant, widespread and locally recorded soprano pipistrelle (*P. pygmaeus*) and common pipistrelle (*P. pipistrellus*) and potentially the rarer Brandt's / whiskered bats (*Myotis brandtii* / *mystacinus*). The presence of a maternity colony is unlikely based on the evidence found but cannot be ruled out at this stage.
- 6.2.4** The common pipistrelle (*P. pipistrellus*) and soprano pipistrelle (*P. pygmaeus*) are the most abundant and widespread bats in Great Britain. These species occur in almost any

habitat type and are well adapted to the built environments; they are the species most regularly reported roosting in houses and churches (Mathews et al. 2018). Brandt's / whiskered bat (*Myotis brandtii* / *mystacinus*) are small *Myotis* species that are widespread and will roost in the same buildings as the much more abundant pipistrelle species (Mathews et al. 2018). Roosts supporting these species hold site to county level conservation importance subject to the roost type, i.e. non-breeding roosts supporting individual bat or small groups through to maternity roosts supporting large numbers of female bats (Reason & Wray 2025).

7 IMPACT ASSESSMENT

7.1 Potential Impacts of Development Proposals

Overview

- 7.1.1** The development proposals for the property involve enlarging the first floor accommodation and demolishing the detached garage. 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 proposals will directly impact the roof void and multiple potential access points/roost sites. Construction activities could therefore lead to direct/indirect disturbance, injury and/or death of bats.

Post Development

- 7.1.3** In the absence of mitigation and/or compensation, future proposals would result in the permanent loss of at least one confirmed bat roost. The loss of a roost has potential to significantly affect the local distribution or abundance of a bat species, subject to its conservation status.

7.2 Recommended Actions

- 7.2.1** If proposals cannot be altered to avoid the potential adverse effects on bats in the building, further surveys are recommended to determine the presence or absence of active bat roosts in the property, in order to be able to assess fully whether development proposals will have an adverse effect on bats (see **Appendix 3** for further survey rationale). The recommended further surveys are detailed in **Section 8.1** below.

8 RECOMMENDATIONS

8.1 Further Surveys

- 8.1.1** Further surveys are recommended to determine the presence or absence of active bat roosts in the dwelling in order to be able to assess fully whether the proposals will have an adverse effect on bats.
- 8.1.2** A minimum of three dusk emergence survey visits should be undertaken on the main property in the period of May to August; the survey visits should be spaced at least three weeks apart. These survey visits will determine the presence or likely absence of bats which is necessary to inform an impact assessment and mitigation strategy.
- 8.1.3** The features on the garage should be thoroughly investigated using an endoscope. Should evidence be found or a full inspection of all crevices is not possible, a minimum of one dusk emergence survey visit should be undertaken for the garage in the period of May to August.
- 8.1.4** Once roost characterisation is complete, an impact assessment with reference to the mitigation hierarchy will be made. In cases where the adverse effects caused by the development proposals are unavoidable, an application for a European Protected Species (EPS) mitigation licence or the registration of the site under the Bat Mitigation Class Licence (BMCL) would be required to permit the work to proceed lawfully. An EPS mitigation licence or BMCL can be issued by Natural England if the three licensing tests (detailed in **Paragraph 3.3.1**) have been satisfied by the proposals.
- 8.1.5** To satisfy one of the licensing tests, it would be necessary to demonstrate that the 'favourable conservation status' of the bat species using the building(s) is maintained during the construction phase and post development. A mitigation strategy setting out avoidance, mitigation, compensation and enhancement measures would be required to achieve this. Indicative and provisional measures are summarised in **Section 8.2** below.

8.2 Indicative Mitigation Strategy

- 8.2.1** If further surveys and the impact assessment have demonstrated that an EPS mitigation licence or Bat Mitigation Class Licence (BMCL) (for low conservation roosts) is required to permit lawful development, the commencement of construction activities impacting the bat roosts would be timed to avoid the periods when bats are most susceptible to disturbance, i.e. winter hibernation period if there is a reasonable likelihood of hibernating bats (mid-November to mid-March) and peak breeding season (May to August) if a

maternity colony is present.

- 8.2.2** Alternative roost sites would be made available to bats prior to and throughout the construction phase by installing at least one woodcrete bat box (suitable for the type of roost/species present) on a suitable mature tree or a pole mount. The bat box should be positioned at least 4 metres from the ground, away from artificial lighting and sheltered from strong wind while being exposed to sunshine (usually south, south east or south west facing).
- 8.2.3** Before the commencement of construction activities impacting the bat roost (i.e. the licensable works), a licensed ecologist or 'Registered Consultant' under the BMCL would provide a toolbox talk to all contractors working on site detailing how bats use buildings, legal protection, working methods (i.e. roof strip by hand), actual and potential roost sites, actions to be taken if a bat is found and personal safety procedures.
- 8.2.4** A soft strip approach to the works affecting the bat roost(s) would be adopted, i.e. careful removal of roof coverings and hanging tiles by gloved hands and handheld tools under the direct supervision of a licensed ecologist or 'Registered Consultant'. In the event that a bat is found during the course of the works, the licensed ecologist or 'Registered Consultant' would capture the bat and transfer it directly to a woodcrete bat box installed in advance.
- 8.2.5** Replacement bat access points and roost sites may need to be created and/or reinstated into the building as part of an EPS mitigation licence or BMCL site registration. This compensation should aim for like-for-like roost sites with access points corresponding as closely as possible to the previous locations.
- 8.2.6** Where access is provided for bats, a bituminous roofing felt that does not contain polypropylene/polyethylene filaments (e.g. bitumen felt type 1F) or a non-bitumen coated 'breathable' membrane that has passed the snagging propensity test (e.g. TLX 'Bat Safe') should be used; other non-bitumen coated membranes are harmful to bats and must be avoided.

9 REFERENCES

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

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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.