

Barn 1
Sindlesham Road
Arborfield
Wokingham
RG2 9JH

Preliminary Roost Assessment & Great Crested Newt Statement

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<i>Report Quality Control Information</i>	
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1 EXECUTIVE SUMMARY

- 1.1.1** John Wenman Ecological Consultancy was instructed by Stuart MacSwan to prepare a Preliminary Roost Assessment (PRA) and Great Crested Newt (*Triturus cristatus*) (GCN) Statement for Barn 1, Sindlesham Road in Arborfield, Wokingham. The PRA and GCN Statement were commissioned to accompany a householder planning application to be submitted to the Wokingham Borough Council seeking consent for the erection of a single-storey extension.
- 1.1.2** A site visit was undertaken on the 6th March 2025 by Conor Watson ACIEEM registered under Natural England Survey Class Licences CL08 and CL18.
- 1.1.3** Low numbers of small bat droppings resembling those typically deposited by pipistrelle species were identified at two locations on the building's exterior. The property has been classified as a confirmed roost with high suitability; the two roost locations behind the timber weatherboarding potentially provide conditions suitable for a maternity colony.
- 1.1.4** The development proposals directly impact a roosting location on the rear gable and do not have the scope to be altered to avoid potential adverse effects on bats. Therefore, further survey is recommended to characterise the confirmed roost and to determine the presence or likely absence of other bat roosts in the property (see **Section 7.1**).
- 1.1.5** The application site falls inside a red risk zone (from NatureSpace modelling for GCN district licensing) and is within 50m of a known pond. However, the known pond (Pond 1) is a duck pond that is considered to be currently unsuitable for breeding GCN. The site is a residential property with no standing water, i.e. GCN breeding habitat, and only garden habitats, i.e. terrestrial habitats of negligible value to GCN.
- 1.1.6** Based on the assumption that the nearby ponds support breeding GCN, i.e. the worst case scenario, the Natural England Rapid Risk Assessment Tool indicated that the proposed development is highly unlikely to result in an offence. However, in the absence of mitigation there is an extremely low risk that individual GCNs could potentially be injured and/or killed during the construction activities if traversing across the habitats on site. To avoid this, it is recommended that reasonable avoidance measures to minimise the risk of killing individual GCNs are implemented during the construction phase (see **Section 7.2**).
- 1.1.7** This report contains information regarding a mobile species so it will likely be valid for 12 months only (CIEEM 2019).

2 INTRODUCTION

2.1 Project Background

2.1.1 John Wenman Ecological Consultancy was instructed by Stuart MacSwan to prepare a Preliminary Roost Assessment (PRA) and Great Crested Newt (*Triturus cristatus*) (GCN) Statement for Barn 1, Sindlesham Road in Arborfield, Wokingham.

2.1.2 The PRA and GCN Statement were commissioned to accompany a householder planning application to be submitted to the Wokingham Borough Council seeking consent for the erection of a single-storey extension (see planning drawings in **Appendix 1**).

2.2 Site Location and Context

2.2.1 The property is a barn conversion at the Arborfield Cross end of Sindlesham Road, Wokingham (central OS grid reference: SU 7616 6719).

2.2.2 The property is set amongst countryside characterised by farm fields with hedgerows/tree-lines which connect to ancient woodland, such as Hazeltons (approx. 460m northeast), and the Barkham Brook (approx. 570m northeast). A duck pond is present at Lockey Farm on the opposite side of Sindlesham Road (approx. 40m west).

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.

2.3.2 For householder applications that are in a red or amber risk zone (from NatureSpace modelling for GCN district licensing) and within 50m of a known pond, a GCN Statement is required to either demonstrate that harm is unlikely (e.g. through non-licensable measures) or that the risk of harm needs to be mitigated through licensable measures (e.g. district licensing).

3 LEGISLATIVE AND POLICY BACKGROUND

3.1 Relevant Legislation

3.1.1 In England and Wales, all bat species and Great Crested Newt (*Triturus cristatus*) (GCN) 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/GCN;
- Deliberately, intentionally or recklessly disturb bats/GCN; 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/GCN for breeding or resting; and
- Intentionally or recklessly obstruct access to any place used by a bat/GCN 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)(e) – 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 The District Level Licensing (DLL) scheme is an alternative approach to traditional mitigation licensing which authorises developments that adversely affect GCNs. Instead of relying solely on site-specific mitigation and compensation, a 'Conservation Payment' can be made to fund a net increase in GCN habitat elsewhere. Please refer to the NatureSpace guidance for more details.

3.3.5 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 and Great Crested Newt (*Triturus cristatus*) (GCN) was undertaken to collate and review existing information about the site and the surrounding land. The study utilised the following open access resources:

- Google Earth and OS maps – satellite imagery and maps were used to identify potential flight paths and foraging habitats for bats, and to identify potential breeding ponds and terrestrial habitat connectivity;
- MAGIC – examined to locate granted European Protected Species (EPS) licences; and
- Pre-existing ecology reports – any available reports were obtained from the client or relevant planning portal to provide background information for the site.

4.2 Building Inspection

Survey Details

4.2.1 A detailed inspection of the exterior and interior of the property was undertaken on the 6th March 2025 by Conor Watson ACIEEM registered under Natural England Bat Survey Class Licence CL18 (Registration no.: 2024-11877-CL18-BAT), in accordance with good practice guidelines (Collins 2023). The equipment used during the inspection comprised binoculars, a high-power (1 million candlepower) LED torch, a headtorch, an industrial endoscopic camera, 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 12 months only (CIEEM 2019).

4.3 Site Walkover

Survey Details

- 4.3.1** A visual assessment of the site for its potential to support GCN was undertaken on the 6th March 2025 by Conor Watson ACIEEM registered under Natural England GCN Survey Class Licence CL08 (Registration no.: 2018-36455-CLS-CLS).
- 4.3.2** GCNs require standing water for breeding and favour small to medium-sized ponds with surface areas ranging from 50m² to 250m². For larval development to take place and young newts to emerge from ponds, ponds must hold water until the end of August (Langton *et.al.* 2001).
- 4.3.3** GCNs require terrestrial habitats for feeding, movement from pond to pond and for hibernation. Habitats of greatest value to GCNs are those listed below that provide invertebrate prey and provide cover such as under logs or stones:
- Woodland;
 - Rough grassland;
 - Scrub;
 - Hedgerows; and

- Waste ground.

4.3.4 Terrestrial habitats of highest value to GCNs are those rich in invertebrate prey, which provide cover during periods of cold and dry weather, such as under logs or stones for example. Open habitats, such as closely mown grassland, do not provide important habitats for feeding or shelter but can be traversed by GCNs moving between more preferable habitats (English Nature 2001; Langton *et. al.* 2001).

Impact Risk Assessment

4.3.5 A risk assessment of the impacts to GCN was carried out using the Natural England Rapid Risk Assessment Tool. The Tool takes into account the impacts of the development on GCN and determines the likelihood of effects on populations in the absence of mitigation.

Survey Limitations

4.3.6 There were no significant survey limitations because GCN habitat assessments can be carried out at any time of year under any weather conditions and the application site was fully accessible.

5 SURVEY RESULTS

5.1 Bats

Desk Study

5.1.1 The property is set amongst countryside characterised by farm fields with hedgerows/tree-lines which connect to ancient woodland, such as Hazeltons (approx. 460m northeast), and the Barkham Brook (approx. 570m northeast). The hedgerows/tree-lines provide flight paths to the high-quality foraging areas, i.e. nearby woodland and riparian habitats, for bats roosting locally.

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

Table 1. Bat mitigation licences granted within a 2km radius (Source: MAGIC).

Case Reference of Granted Licence	Species on the Licence	Licensable Period	Licensable Works	Distance (m)
2018-38593-EPS-MIT	Common pipistrelle Soprano pipistrelle	2019-2023	Destruction of resting place	1030SW
2016-26319-EPS-MIT 2016-26319-EPS-MIT-2	Brown long-eared bat Common pipistrelle Soprano pipistrelle	2016-2021	Destruction of resting place	1410SE
2019-38952-EPS-MIT	Common pipistrelle	2019-2024	Destruction of resting place	1720S
2017-31454-EPS-MIT	Common pipistrelle Soprano pipistrelle	2017-2022	Destruction of resting place	1720SE
2017-31865-EPS-MIT 2017-31865-EPS-MIT-1 2017-31865-EPS-MIT-2	Brown long-eared bat Common pipistrelle Natterer's bat Soprano pipistrelle	2017-2023	Destruction of resting place	1900SE
2015-7687-EPS-AD2	Brown long-eared bat Common pipistrelle	2015-2020	Destruction of resting place	1930SE
2015-18114-EPS-MIT 2015-18114-EPS-MIT-1 2015-18114-EPS-MIT-2 2015-18114-EPS-MIT-3 2015-18114-EPS-MIT-4	Brown long-eared bat Common pipistrelle Daubenton's bat Noctule Soprano pipistrelle	2016-2021	Damage & destruction of resting place & breeding site	2000N

5.1.3 There were no pre-existing bat survey reports for the property.

Building Inspection

5.1.4 The findings from the external and internal inspections carried out for the property are

described with photographs and are annotated in a plan (see **Figure 1**), as follows:

External Survey

- 5.1.5** The property was a barn conversion with brick walls, timber weatherboarding and a half-hipped roof (**Photographs 1, 2 & 3**).



Photograph 1. Front of property viewed from south.



Photograph 2. Side of property viewed from west.



Photograph 3. Rear of property viewed from north.

- 5.1.6** The roof was covered in handmade clay tiles which naturally have gaps that offer potential roost sites to small crevice-dwelling bats, such as the pipistrelle species (*Pipistrellus* spp.) (**Photographs 4 & 5**).



Photograph 4. Handmade clay tiles (front elevation).



Photograph 5. Handmade clay tiles (western elevation).

- 5.1.7** The timber weatherboarding was painted black and the boards overlapped tightly on each gable; two sealed hayloft doors were present (**Photographs 6, 7 & 8**).



Photograph 6. Eastern gable with hayloft door (eastern elevation).



Photograph 7. Western gable (western elevation).



Photograph 8. Rear gable with hayloft door (rear elevation).

- 5.1.8** Five small bat droppings, resembling those typically deposited by pipistrelle species (*Pipistrellus* spp.), were stuck to lead flashing at the bottom of the weatherboarding on the western gable (**Photograph 9; Target note 1**). There was potential bat ingress behind the strip of lead flashing but also beneath the eave overhang where a weatherboard was lifted (**Photograph 10**).



Photograph 9. Small bat droppings stuck to lead flashing (western elevation).



Photograph 10. Potential bat ingress behind lifted weatherboard (western elevation).

- 5.1.9** At least another 20 small bat droppings were caught behind lead flashing at the bottom

of the weatherboarding on the rear gable (**Photographs 11 & 12; Target note 2**). The weatherboarding above the bat droppings appeared tight but there was potential ingress behind the strip of lead flashing (**Photographs 13 & 14**).



Photograph 11. Small bat dropping stuck to lead flashing (rear elevation).



Photograph 12. Small bat droppings caught behind lead flashing (rear elevation).



Photograph 13. Potential bat ingress behind lead flashing (rear elevation).



Photograph 14. Potential bat ingress behind lead flashing (rear elevation).

Internal Survey

- 5.1.10** The roof space of the barn had been fully converted into living space with vaulted ceilings (**Photograph 15**).



Photograph 15. Vaulted ceiling.

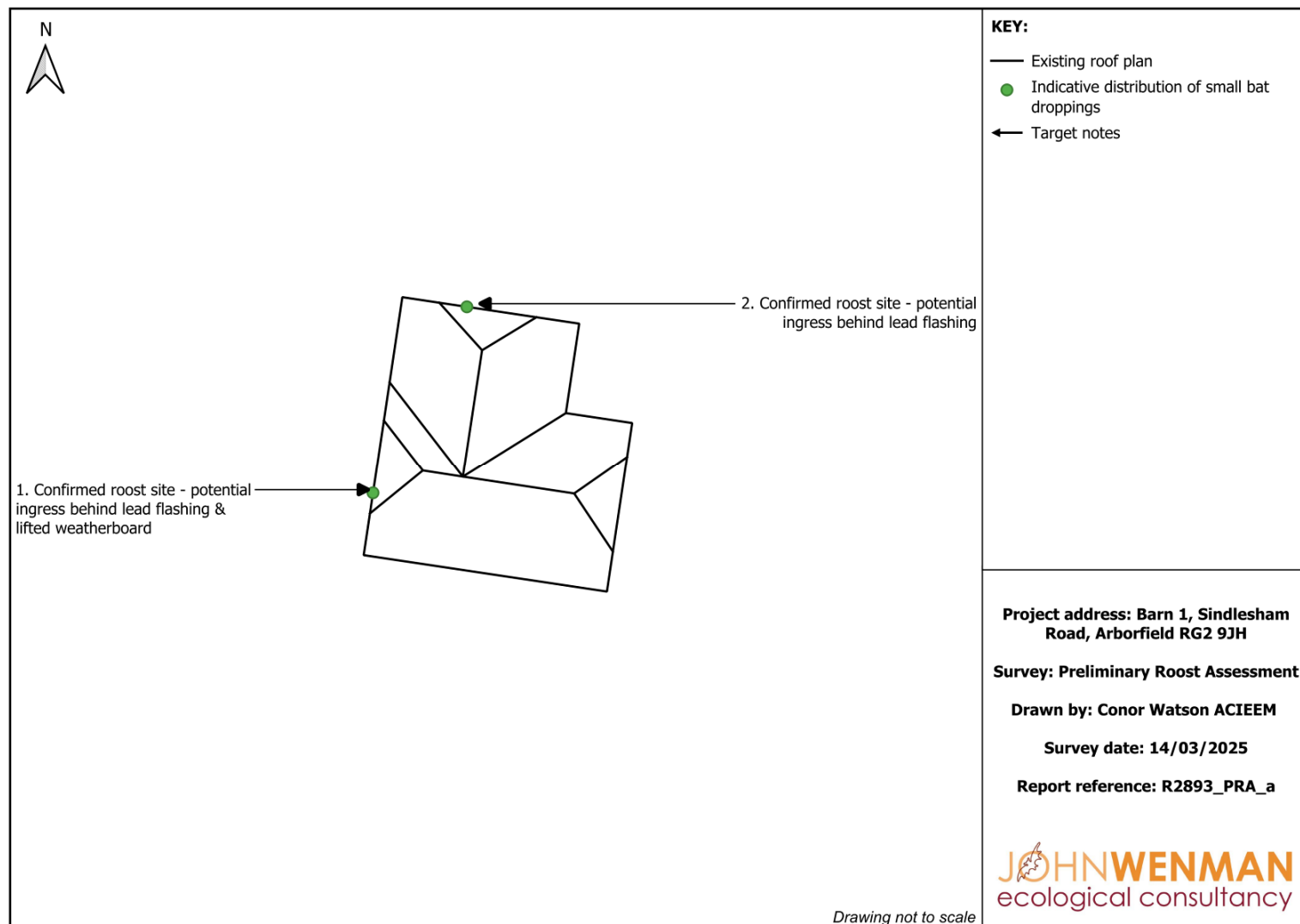


Figure 1. Building Inspection Plan.

5.2 Great Crested Newt

Desk Study

- 5.2.1** The desk study has identified two ponds within a 250m radius of the application site: Pond 1 – a duck pond at Lockey Farm approximately 45m northwest; and Pond 2 – a farm pond approximately 160m north (see **Figure 2**).



Figure 2. Pond Location Map.

- 5.2.2** Pond 1 is a duck pond that is considered to be currently unsuitable for breeding Great Crested Newt (*Triturus cristatus*) (GCN) (**Photograph 16**).



Photograph 16. Duck pond at Lockey Farm (Pond 1).

- 5.2.3** Pond 2 is situated within a wooded strip that runs parallel to Sindlesham Road,

providing potential habitat connectivity to the site via a culvert.

- 5.2.4** No GCN mitigation licences have been granted within the last 10 years inside a 2km radius of the application site and there were no pre-existing GCN survey reports for the property.

Site Walkover

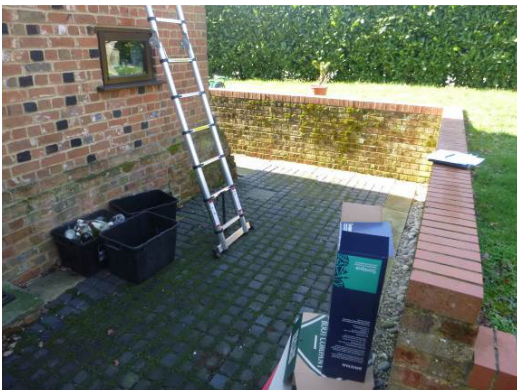
- 5.2.5** The findings from the visual inspection of the site are described with photographs, as follows:
- 5.2.6** The garden lawn was closely-mown and comprised cock's-foot (*Dactylis glomerata*), common daisy (*Bellis perennis*), creeping bent (*Agrostis stolonifera*), perennial ryegrass (*Lolium perenne*), red dead-nettle (*Lamium purpureum*), selfheal (*Prunella vulgaris*), springy turf moss (*Rhytidiadelphus squarrosus*) and stone parsley (*Sison amomum*) (**Photograph 17**).
- 5.2.7** The garden hedges consisted of cherry laurel (*Prunus laurocerasus*) and winter jasmine (*Jasminum nudiflorum*) (**Photograph 18**). There was a small garden patio with gravel borders separated from the lawn by a brick wall (**Photographs 19 & 20**).



Photograph 17. Garden lawn and hedge.



Photograph 18. Garden hedge.



Photograph 19. Garden patio and brick wall.



Photograph 20. Garden patio and brick wall.

Impact Risk Assessment

- 5.2.8** Based on the assumption that the nearby ponds support breeding GCN, i.e. the worst case scenario, the Natural England Rapid Risk Assessment Tool was used to assess the risk of the development proposals adversely affecting GCN. The development footprint is less than 0.01ha and the Tool indicates that the loss or damage to 0.001-0.01ha of land within 100m of a breeding pond (i.e. Pond 1) and 100-250m away from another breeding pond (i.e. Pond 2) is highly unlikely to result in an offence (see **Figure 3**).

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	0.001 - 0.01 ha lost or damaged	0.05
Land 100-250m from any breeding pond(s)	0.001 - 0.01 ha lost or damaged	0.005
Land >250m from any breeding pond(s)	No effect	0
Individual great crested newts	No effect	0
Maximum:		0.05
Rapid risk assessment result:		GREEN: OFFENCE HIGHLY UNLIKELY

Guidance on risk assessment result categories

"**Green: offence highly unlikely**" indicates that the development activities are of such a type, scale and location that it is highly unlikely any offence would be committed should the development proceed. Therefore, no licence would be required. However, bearing in mind that this is a generic assessment, you should carefully examine your specific plans to ensure this is a sound conclusion, and take precautions (see **Non-licensed avoidance measures tool**) to avoid offences if appropriate. It is likely that any residual offences would have negligible impact on conservation status, and enforcement of such breaches is unlikely to be in the public interest.

Figure 3. Natural England Rapid Risk Assessment Tool.

6 DISCUSSION

6.1 Bats

Assessment of Roost Suitability/Status

- 6.1.1** The property is set amongst countryside characterised by farm fields with hedgerows/tree-lines which connect to ancient woodland, such as Hazeltons (approx. 460m northeast), and the Barkham Brook (approx. 570m northeast). The hedgerows/tree-lines provide flight paths to the high-quality foraging areas, i.e. nearby woodland and riparian habitats, for bats roosting locally. Furthermore, the search of bat mitigation licences identified at least one breeding site and six species roosting locally: brown long-eared bat (*Plecotus auritus*), common pipistrelle (*Pipistrellus pipistrellus*), Daubenton's bat (*Myotis daubentonii*), Natterer's bat (*Myotis nattereri*), noctule (*Nyctalus noctula*) and soprano pipistrelle (*Pipistrellus pygmaeus*).
- 6.1.2** The roof space of the barn had been fully converted into living space with vaulted ceilings so the presence of typically void-dwelling bats, such as the locally recorded brown long-eared bat (*P. auritus*), is considered highly unlikely. Also, there were no mortise joints in the barn accessible for roosting bats; in particular, the locally recorded Natterer's bat (*M. nattereri*) which is known to roost in these features year-round.
- 6.1.3** Externally, the roof was covered in handmade clay tiles which naturally have gaps that offer potential roost sites to small crevice-dwelling bats, such as the locally recorded common pipistrelle (*P. pipistrellus*) and soprano pipistrelle (*P. pygmaeus*). Additionally, low numbers of small bat droppings resembling those typically deposited by pipistrelle species (*Pipistrellus* spp.) were identified at two locations on the building's exterior:
1. Five small bat droppings were stuck to lead flashing at the bottom of the weatherboarding on the western gable and there was potential ingress behind the strip of lead flashing but also beneath the eave overhang where a weatherboard was lifted (**Photographs 9 & 10**)
 2. At least another 20 small bat droppings were caught behind lead flashing at the bottom of the weatherboarding on the rear gable; the weatherboarding above the bat droppings appeared tight but there was potential ingress behind the strip of lead flashing (**Photographs 11 & 12**)
- 6.1.4** Due to the nature of the roosting locations in conjunction with the surrounding habitat, the property is considered to have the potential to support large numbers of small crevice-dwelling bats and as such, has been classified as a confirmed roost with high

suitability (see **Appendix 2** for potential suitability categories). The two roost locations behind the timber weatherboarding potentially provide conditions suitable for a maternity colony of small crevice-dwelling bats, such as the locally recorded pipistrelle species (*Pipistrellus* spp.).

- 6.1.1** 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 (see **Appendix 3** 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 2023).

Impact Assessment and Recommended Actions

- 6.1.2** The development proposals seek consent for the erection of a single-storey extension (see planning drawings in **Appendix 1**). These proposals directly impact the roosting location on the rear gable and do not have the scope to be altered to avoid potential adverse effects on bats. Therefore, further survey is recommended to characterise the confirmed roost and to determine the presence or likely absence of other bat roosts in the property (see **Appendix 4** for further survey rationale). The recommended survey approach and indicative mitigation proposals are detailed in **Section 7.1** below.

6.2 Great Crested Newt

Assessment of Habitat Suitability

- 6.2.1** The application site falls inside a red risk zone (from NatureSpace modelling for GCN district licensing) and is within 50m of a known pond. However, the known pond (Pond 1) is a duck pond that is considered to be currently unsuitable for breeding Great Crested Newt (*Triturus cristatus*) (GCN) (**Photograph 16**).
- 6.2.2** The site is a residential property with no standing water, i.e. GCN breeding habitat, and only garden habitats including a closely-mown lawn, ornamental hedges and patio, i.e. terrestrial habitats of negligible value to GCN.

Impact Assessment and Recommended Actions

- 6.2.3** The development proposals seek consent for the erection of a single-storey extension with a footprint less than 0.01ha (see planning drawings in **Appendix 1**). The development footprint is small and will impact existing garden habitats, i.e. terrestrial habitats of negligible value to GCN, only.
- 6.2.4** Based on the assumption that the nearby ponds support breeding GCN, i.e. the worst case scenario, the Natural England Rapid Risk Assessment Tool was used to assess the risk of the development proposals adversely affecting GCN. The development footprint is less than 0.01ha and the Tool indicates that the loss or damage to 0.001-0.01ha of land within 100m of a breeding pond (i.e. Pond 1) and 100-250m away from another breeding pond (i.e. Pond 2) is highly unlikely to result in an offence.
- 6.2.5** In line with the guidance contained in the Tool and the impact assessment presented above, the nature and scale of the proposed development is highly unlikely to breach legislation protecting GCN or their habitats. However, in the absence of mitigation there is an extremely low risk that individual GCNs could potentially be injured and/or killed during the construction activities if traversing across the habitats on site. To avoid this, it is recommended that reasonable avoidance measures to minimise the risk of killing individual GCNs are implemented during the construction phase – as set out in **Section 7.2** below.

7 RECOMMENDATIONS

7.1 Bats

Further Survey

- 7.1.1** Three dusk emergence survey visits should be undertaken in the period of May to September, with at least two of the visits between May and August (i.e. optimal survey season); the survey visits should be spaced at least three weeks apart. These survey visits form part of the roost characterisation necessary to inform an impact assessment and mitigation strategy; the roost characterisation may involve other methods, such as DNA analysis of bat droppings.
- 7.1.2** 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.
- 7.1.3** To satisfy one of the licensing tests, it would be necessary to demonstrate that the 'favourable conservation status' of the bat species using the property 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 (see below).

Indicative Mitigation Strategy

- 7.1.4** If further surveys and the impact assessment demonstrate that an EPS mitigation licence or BMCL (if applicable) 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.
- 7.1.5** Alternative roost sites would be made available to bats before and throughout the construction phase by likely 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 3 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).

- 7.1.6** 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. soft demolition/strip by hand), actual and potential roost sites, actions to be taken if a bat is found and personal safety procedures.
- 7.1.7** A soft demolition/strip approach to the works affecting the bat roosts would be adopted, i.e. careful removal of roof tiles by gloved hands and handheld tools under the direct supervision of a licensed ecologist or 'Registered Consultant'. If 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.
- 7.1.8** Replacement bat access points and roost sites may need to be created and/or reinstated into the replacement dwelling 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.
- 7.1.9** 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.

7.2 Great Crested Newt

Reasonable Avoidance Measures

- 7.2.1** The following reasonable avoidance measures should be adopted to minimise the extremely low risk of harming individual GCNs:

Pre-commencement of construction activities

- Any removal of rockery, debris or leaf litter will be carefully searched by hand looking for amphibians; and
- The formal mowing of the lawn should be maintained prior to the commencement of site work to minimise the likelihood of GCN being present during excavations.

During construction activities

- Any stored building materials or waste, such as bricks or debris etc., that might offer shelter for GCN will be kept raised off the ground on pallets or on existing hard standing, and efforts should be made to process and removed from site as soon as possible; and
- Excavation works will be avoided after dusk and any open excavations or trenches will be backfilled (after a check for GCN presence) or left with escape ramps to prevent GCN from becoming trapped.

7.2.2 In the unlikely event that a GCN is found during the course of construction, works will stop immediately and a licensed ecologist will be called onto site to ensure the GCN is not harmed and provide further advice on how to proceed; work will recommence only once further written advice has been received.

Enhancement Opportunities

7.2.3 The value of the application site to wildlife could be enhanced by adding features suitable for sheltering and hibernating GCN, such as creating rockeries and allowing areas of grassland to grow tall and diversify.

8 REFERENCES

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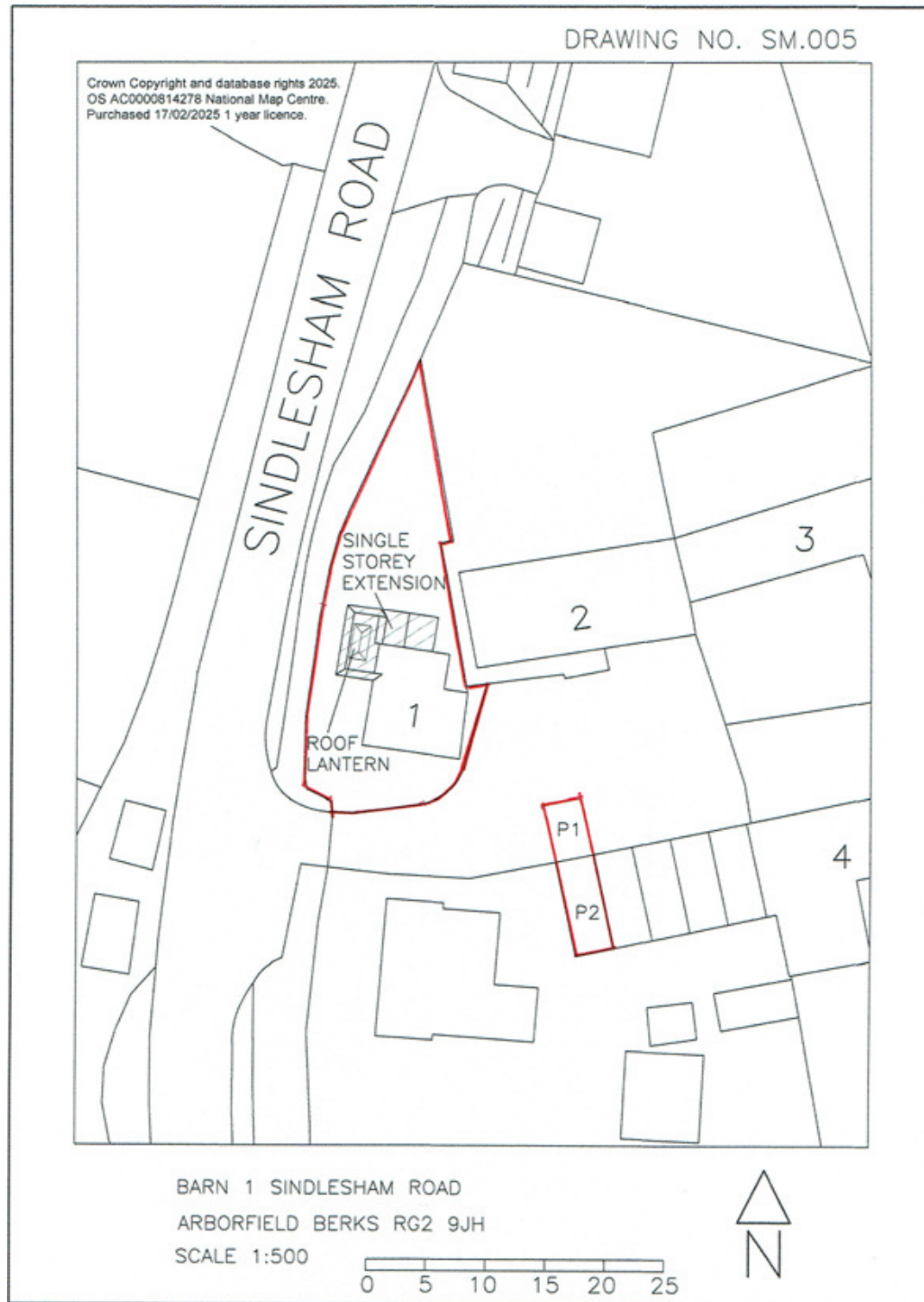
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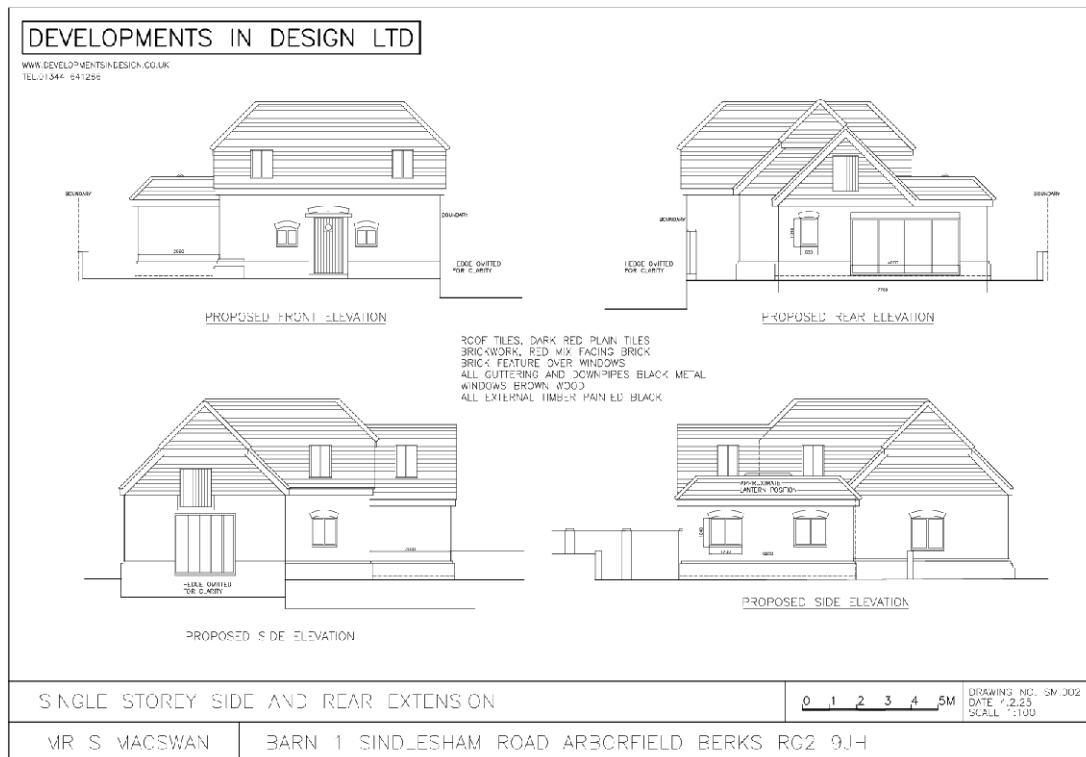
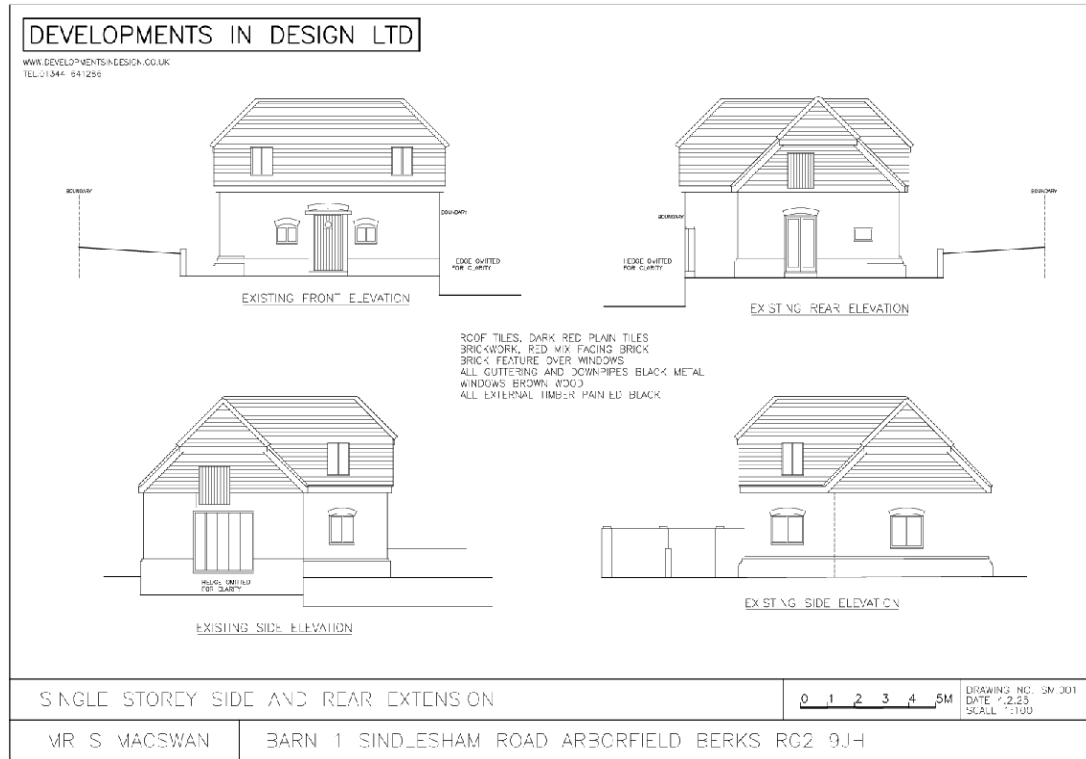
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APPENDIX 1 – PLANNING DRAWINGS





APPENDIX 2 – 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 3 – 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 4 – 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.