

Preliminary Roost Assessment

Grove Service Station, Old Bath Road, Charvil, Twyford

RG10 9QJ

Status	Issue	Name	Date
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Industry Guidelines and Standards

This report has been written with due consideration to:

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

Executive Summary

Ecologist Rachel Richards was instructed by David Ormes of Partington Associates to undertake a Preliminary Roost Assessment (PRA) at Grove Service Station, Old Bath Road, Charvil, Twyford RG10 9QJ (hereafter referred to as “the site”). The survey was required to inform a planning application for a change of use of the site that will include the demolition of the central garage.

The following is work you will need to commission to comply with planning policy and legislation. Further information, along with opportunities for biodiversity enhancement, are outlined in Table 6 of this report.

Building	Survey Results Summary	Impact Assessment	Recommendations
Roosting bats (B1)	B1 has low habitat value for roosting bats due to cracks and damage to the asbestos sheeting. According to the MAGIC.gov database, the closest EPSL is located 537m east of the site for the destruction of a resting place and breeding site for brown long-eared bats.	The proposed development will result in the demolition of this building. This could result in damage and destruction of any bat roosts present and could cause disturbance, death or injury to bats.	One bat emergence survey is required during the active bat season (optimal May to August, suboptimal September) to confirm the presence or likely absence of a bat roost in the building. The surveys should be completed during the optimal survey period mid-May to August inclusive. Infra-red cameras should be used as an aid. Three surveyors are required to provide full coverage of all the suitable features of the building. If bat roosts are confirmed in the building, further surveys will be required to determine the type of roost. Once the surveys are complete an EPSL application to Natural England will be required. The EPSL application requires that surveys have been undertaken within the most recent active bat season. Planning permission must have been granted and all relevant wildlife-related conditions been discharged prior to submission.

Foraging and commuting bats	Tree-lined boundaries and waterbodies located behind the site could be used by local batpopulations for foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site.	The proposed development will include the use of lighting that could spill onto bat roosting, foraging or commuting habitat and deter bats from using these areas.	A low-impact lighting strategy will be adopted for the site during and post-development.
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1.0 Introduction and Context

1.1 Background

Ecologist Rachel Richards was instructed by David Ormes of Partington Associates to undertake a Preliminary Roost Assessment (PRA) at Grove Service Station, Old Bath Road, Charvil, Twyford RG10 9QJ (hereafter referred to as “the site”). The survey was required to inform a planning application for a change of use of the site that will include the demolition of the central garage (B1) and the removal of two small outbuildings (B2 & B3).

The aim of the PRA was to determine the presence or evaluate the likelihood of the presence of roosting bats, and to gain an understanding of how bats could use the site for roosting, foraging or commuting. This has been undertaken with due consideration to the “Bat Surveys for Professional Ecologists —Good Practice Guidelines” publication (Collins, 2023).

1.2 Site Location and Landscape Context

The site is located at National Grid Reference SU 78155 76023 and has an area of approximately 0.49ha comprising four buildings - a central garage (B1), two outbuildings (B2 & B3) and a second larger garage (B4), as well as a large area of hard standing around each building and a tree-lined boundary. To the south of the site is the Loddon Nature Reserve, which consists of several large water bodies and areas of woodland. To the east and west of the site are residential areas and to the north are areas of arable land with associated hedgerows. A site location plan is provided in Appendix 2.

1.3 Scope of the Report

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

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

2.0 Methodology

2.1 Desk Study

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

2.2 Field Survey

The survey was undertaken by Rachel Richards BSc (Hons), Freelance Consultant (2023-11650-CL18-BAT) on 24th September 2024.

2.3 Breeding Birds and Other Incidental Observations

The surveyor also made note of any other ecological constraints observed during the survey, notably the likelihood of the presence or signs of breeding birds, and the suitability of the site for barn owls.

2.4 Suitability Assessment

The PRA comprised an assessment of each building to be impacted by the proposed development for the potential to support roosting bats. The survey was led by an experienced ecologist and was based on current best practice guidelines (Collins 2023). All features that are likely to be impacted by the proposed development were assessed for their potential to support roosting bats. The surveyor systematically surveyed all features suitable for bats and signs of bat activity.

The PRA included a visual inspection (including the use of binoculars, endoscope and torches where required) of the exterior and interior of each building for evidence of bat use (e.g. droppings, scratch marks, staining and sightings). Factors considered whilst undertaking the PRA comprised internal conditions, the presence of features suitable for use by roosting bats, proximity to foraging habitats or cover and potential for disturbance. Notes were made relating to relevant characteristics of features providing potential access points and roosting opportunities for bats. Table 1 below details the rationale for determining bat roost value of buildings subject to the PRA.

Table 1: Rationale for assigning bat roost value.

Assigned Bat Roosting Habitat Value	Description/ Rationale
Confirmed roost	Evidence of roosting bats within the building.
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 the potential to support high conservation status roosts, e.g. maternity or classic cool/ stable hibernation site.
Medium	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, condition and surrounding habitat but unlikely to support a roost of high conservation status, such as maternity and hibernation.

Low	A building with one or more potential roost sites that could be used by individual bats opportunistically at any time of year. However, these potential roost sites 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. unlikely to be suitable for maternity and not a classic cool/ stable hibernation site but could be used by individual hibernating bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
None	No habitat features likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/ suitable shelter at all ground. Underground levels.

2.5 Limitations

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

These limitations have been taken into account during the evaluation of the site and the requirement for further surveys and mitigation.

3.0 Results and Evaluation

3.1 Designated Sites

Details of any statutory designated sites with bat qualifying interests within a 2km radius of the site, including their reasons for notification, are provided in Table 2 below.

Table 2: Statutory designated sites with bat qualifying interests within 2km radius of the site

Designated site name	Distance from site	Reasons for notification from Natural England
Alder Moors Local Nature Reserve	1.8km South-west	The site contains ancient woodland, which has been managed using coppicing that has encouraged the growth of the ground flora. The wood has ash, hawthorn and willow trees. The ground flora contains wildflowers such as bluebells, marsh marigolds, primroses and wood anemones.

3.2 Historical Records

A search of the magic.gov.uk database for granted EPSLs within a 2km radius of the site has been completed. Displaced bats from licensed sites <2km away from the survey site will find alternative habitats either within the mitigation measures implemented as part of the licence or will relocate to other known roost sites in close proximity to the licensed site. EPSL records for bats are summarised in Table 3.

Table 3: Granted EPSLs for bats within 2km of the site

EPSL reference	Bat species affected	Impacts allowed by licence
EPSM2010-2250	Brown long-eared bat	Destruction of a resting place and breeding place
2019-43241-EPS-MIT	Common pipistrelle, Soprano pipistrelle and Brown long-eared bat	Destruction of a resting place
2014-2526-EPS-MIT	Soprano pipistrelle	Destruction and damage of a resting place
2020-44644-EPS-MIT	Brown long-eared bat and Common pipistrelle	Destruction of a resting place
2020-49294-EPS-MIT	Common pipistrelle and Soprano pipistrelle	Destruction of a resting place

3.3 Field Survey Results

The weather conditions recorded at the time of the survey are shown in Table 4. The results of the field survey are detailed in Table 5 and illustrated in Appendix 3.

Table 4: Weather conditions during the survey

Date:	24/09/2024
Temperature	15°C
Humidity	83%
Cloud Cover	100%
Wind	5mph
Rain	None

Table 5: PRA Results

Feature	Description	Photographs
B1 – Northern elevation	B1 is a two-story industrial building with the lower section of the walls was constructed of brick and mortar the upper half covered with asbestos corrugated sheeting. All doors and windows have tight seals and no gaps were present under the edge of the roof. Roof was made of asbestos panels and tiles. The building is currently used as a garage and has constant activity and noise disturbance during the garage's opening hours.	

B1 - Northern
elevation

On the northwest corner of the building damage to the asbestos sheeting had created a small gap between the sheeting and the wall. This is potentially suitable for one or two crevice-dwelling bats.

Along the north aspect of the wall was a small crack in the asbestos sheeting, this created a small gap suitable for individual crevice dwelling bats.



B1 - Eastern elevation	The asbestos sheeting on the eastern aspect was in good condition with no cracks or damage. A small brick and mortar single story extension was located on the aspect. The extensions had a flat roof and wood soffit box that was in good condition and sealed. The roof tiles on the eastern elevation were in moderate condition with a few raised. The raised tiles did not lead to any void so would only be suitable for individual bats.	
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B1 -
Southern
elevation

On the southern aspect, the construction was the same as on the northern aspect. All windows and doors had a good seal, with no access to the inside of the building for bats.

Above the door on the second storey was a metal panel, which was lifted in the lower corner. This would be suitable for one or two crevice dwelling bats.



B1 - Southern elevation	Within the asbestos sheeting on the southern aspect were two small holes. These would be suitable for a small number of crevice-dwelling bats.	 The image block contains two photographs of asbestos sheeting. The top photograph shows a close-up of a corrugated asbestos sheet with a small, dark, irregular hole circled in red. The bottom photograph shows a similar corrugated asbestos sheet with another small, dark, irregular hole circled in red. Both holes are located on the southern aspect of the structure.
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B1 - Western elevation	All brickwork was in good condition with no cracks or missing mortar on the western aspect. The windows and door also have a good seal around each preventing access for bats. The asbestos sheeting was in moderate condition with one small section damaged on the southwestern corner. The crack in the sheeting has created a small gap between the sheeting and wall that would be suitable for one or two crevice-dwelling bats.	 
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B1 – interior	There was no roof void within B1, asbestos sheeting lined the roof with tiles on top so there is no void space for bats within the building. In the internal structure, clear panels within the roof provided lighting creating a well-lit interior. Daylight enters the loft through gaps in the gable ends and at the base of the loft space. Gaps around the beam were well sealed.	
B1 – suitability assessment	B1 has a low habitat value for roosting bats due to gaps within the asbestos sheeting and lifted tiles. There was no evidence of bat activity located internally or externally on the survey building. This indicates a likely absence of void-dwelling bats such as brown long-eared bats but cannot be used to indicate a likely absence of crevice dwelling bats. This is because bats such as pipistrelles usually roost between tiles and felt and on wall tops, where any external evidence would be quickly weathered away, and all internal evidence is trapped within these crevices.	

B2 - Northern and Eastern elevations	B2 is a detached single-story corrugated metal shed along the boundary line of the property. The door had been recently installed and was in good condition. None of the roof panels were lifted so no access was available to the interior for bats.	
B2 – interior	Access to the interior was not available at the time of the survey	
B2 – suitability assessment	B2 has negligible habitat value for roosting bats. There was no evidence of bat activity located externally on the survey building.	

B3 – Eastern elevation	B3 is a detached single-storey metal shipping container, all seals around the door were in good condition and an inspection of the container showed no damage to the walls that would allow access for bats.	
B3 – interior	Access to the interior was not available at the time of the survey	
B3 – suitability assessment	B3 has negligible habitat value for roosting bats. There was no evidence of bat activity located externally on the survey building.	

4.0 Conclusions, Impacts and Recommendations

Taking the desk study and field survey results into account, Table 6 presents an evaluation of the value of the site for bats in relation to the proposed development that will comprise planned works for the building on site.

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

Building	Survey Results Summary	Impact Assessment	Recommendations	Biodiversity Enhancement Opportunities ¹
Roosting bats (B1)	B1 has a low habitat value for roosting bats due to cracked and damaged asbestos panels and lifted tiles. According to the MAGIC.gov database, the closest EPSL is located 537m east of the site for the destruction of a resting place and breeding site for brown long-eared bats.	The proposed development will result in the demolition of this building. This could damage and destroy any bat roosts present and cause disturbance, death or injury to bats.	One bat emergence survey is required during the active bat season (optimal May to August, suboptimal September) to confirm the presence or likely absence of a bat roost in the building. The surveys should be completed during the optimal survey period mid-May to August inclusive. Infra-red cameras should be used as an aid. Three surveyors are required to provide full coverage of the all suitable features of the building. If bat roosts are confirmed in the building, further surveys will be required to determine the type of roost. Once the surveys are complete an EPSL application to Natural England will be required. The EPSL application requires that surveys have been undertaken within the most recent active bat season planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission.	To be confirmed upon completion of the surveys.

¹ The Local Planning Authority has a duty to ask for enhancements under the NPPF (2021).

Roosting bats (B2)	B2 is negligible for roosting bats	The proposed development will result in the demolition of this building. This will not impact the local bat population.	No further surveys are required.	Trees adjacent to B2 should be kept and they provide foraging and commuting habitat for bats.
Roosting bats (B3)	B3 is negligible for roosting bats	The proposed development will result in the demolition of this building. This will not impact the local bat population.	No further surveys are required.	Trees adjacent to B3 should be kept and they provide foraging and commuting habitat for bats.
Foraging and commuting bats	Tree-lined boundaries could be used by local bat populations for foraging and commuting. These could also be used by bats dispersing from nearby roosts outside of the site.	The proposed development will not result in the removal of any habitats that could be used by foraging or commuting bats. The proposed development will include the use of lighting that could spill on to bat roosting, foraging or commuting habitat and deter bats from using these areas.	A low impact lighting strategy will be adopted for the site during and post-development, which will include the following measures: • Use narrow spectrum light sources to lower the range of species affected by lighting. • Use light sources that emit minimal ultra-violet light. • Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin. • Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal. • Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only.	The following habitat creation and enhancement opportunities could be incorporated into the proposed development that would be beneficial for foraging bats: Planting of native trees, shrubs and hedgerows to increase foraging opportunities.

			• External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on. • Wall lights and security lights will be 'dimmable' and set to the lowest light intensity settings. There are several products on the market that allow the control of the light intensity and the duration that the lights are on All lighting on the developed site will make use of the most up to date technology available.	
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5.0 Bibliography

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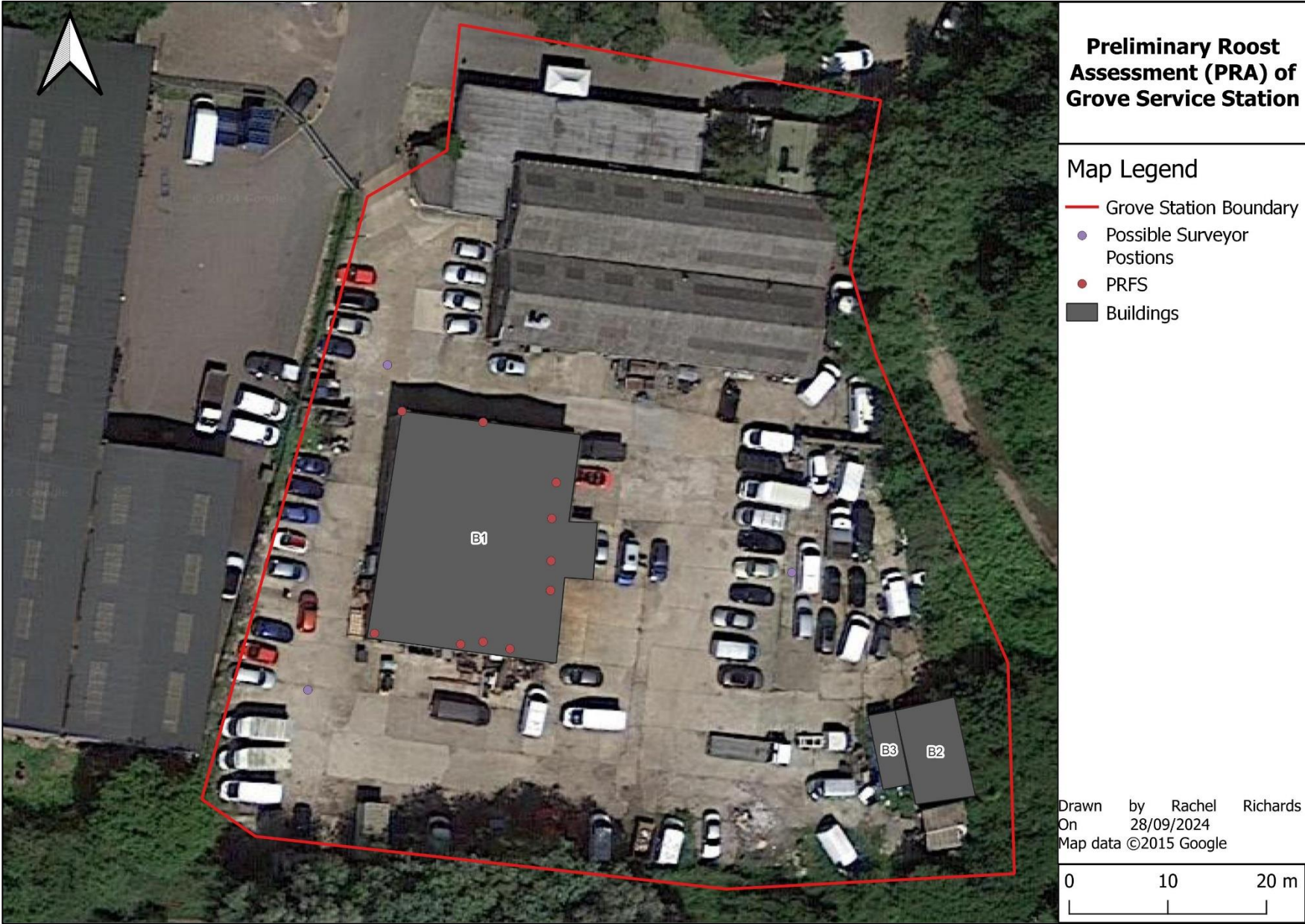
Appendix 1: Proposed Development Plan

Not available at the time of writing this report.

Appendix 2: Site Location Plan



Appendix 3: PRA Plan



Appendix 4: Legislation and Planning Policy Related to Bats

LEGAL PROTECTION

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

Regulation 43: Protection of certain wild animals - offences

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

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

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

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

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

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

NATIONAL PLANNING POLICY

National Planning Policy Framework 2021

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

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

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

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

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

EFFECT OF LEGISLATION AND POLICY ON DEVELOPMENT WORKS

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

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

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

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

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

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

4. conserving wild animals.

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

EUROPEAN PROTECTED SPECIES POLICIES

In December 2016 Natural England officially introduced the four licensing policies throughout England. The four policies seek to achieve better outcomes for European Protected Species (EPS) and reduce unnecessary costs, delays and uncertainty that can be inherent in the current standard EPS licensing system. The policies are summarised as follows:

- Policy 1; provides greater flexibility in exclusion and relocation activities, where there is investment in habitat provision;
- Policy 2; provides greater flexibility in the location of compensatory habitat;
- Policy 3; provides greater flexibility on exclusion measures where this will allow EPS to use temporary habitat; and,
- Policy 4; provides a reduced survey effort in circumstances where the impacts of development can be confidently predicted.

The four policies have been designed to have a net benefit for EPS by improving populations overall and not just protecting individuals within development sites. Most notably Natural England now recognises that the Habitats Regulations legal framework now applies to 'local populations' of EPS and not individuals/site populations.