

PLANNING APPLICATION 250531

MONDAY 14th JULY

WBC DEVELOPMENT CONTROL DUPLICATE COPY

~~GARAGE~~ at Land adjoining Woodlands  
Wick Hill Lane  
Finchampstead  
Wokingham  
RG40 3PZ

## Preliminary Roost Assessment

Report ref.: R2964\_PRA\_a

Report Quality Control Information	
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## **1 EXECUTIVE SUMMARY**

- 1.1.1** John Wenman Ecological Consultancy was instructed by Robert Evans to prepare a Preliminary Roost Assessment (PRA) for the garage at Land adjoining Woodlands, Wick Hill Lane in Finchampstead, Wokingham. The PRA was commissioned to accompany a planning application to be submitted to Wokingham Borough Council seeking consent for the replacement of the existing garage.
- 1.1.2** A site visit was undertaken on the 3<sup>rd</sup> June 2025 by Conor Watson ACIEEM registered under Natural England Survey Class Licence CL18.
- 1.1.3** The garage's prefabricated concrete asbestos roof and single-skin cladding does not possess any potential roosting sites for bats. The dense ivy growing across the roof does not provide any suitable crevices for any opportunistic use by roosting bats. Therefore, the garage has been classified as negligible suitability (see **Appendix 1** for potential suitability categories). No further survey to determine the presence or likely absence of roosting bats (i.e. emergence survey) is deemed necessary.
- 1.1.4** The development proposals, involving the demolition of the existing garage, are considered highly unlikely to result in the damage and/or destruction of a bat roost or cause disturbance, injury and/or death of bats. Therefore, a European Protected Species (EPS) mitigation licence would not be required for the works to proceed lawfully.
- 1.1.5** In the unlikely event that bats are encountered during the works, works must stop immediately and a suitably licensed ecologist should be called to site attend to the bat and provide advice on how to proceed.
- 1.1.6** 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 Robert Evans to prepare a Preliminary Roost Assessment (PRA) for the garage at Land adjoining Woodlands, Wick Hill Lane in Finchampstead, Wokingham.

**2.1.2** The PRA was commissioned to accompany a planning application to be submitted to Wokingham Borough Council seeking consent for the replacement of the existing garage.

### **2.2 Site Location and Context**

**2.2.1** The Land adjoining Woodlands (referred to hereafter as 'the site') is located on the north-western stretch of Wick Hill Lane, accessible via the Nine Mile Ride in Finchampstead, Wokingham (central OS grid reference: SU 7996 6481).

**2.2.2** The site is approximately 0.03ha of land adjacent to Woodlands; a residential property with no physical barrier demarcating its ownership boundary from the site. Wick Hill Lane is a wooded residential lane with scattered deciduous woodland (NERC 2006 Section 41 priority habitat), including a small ancient semi-natural woodland called Wix Hill approximately 330m to the southeast of the site. The wider landscape is characterised by suburbia, woodland, lakes and pastoral countryside.

### **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 31<sup>st</sup> 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)(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** 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:

- Google Earth and OS maps – satellite imagery and maps were used to identify potential flight paths and foraging habitats;
- MAGIC – examined to locate granted European Protected Species (EPS) licences; and
- Pre-existing bat 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 3<sup>rd</sup> June 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).

## 5 SURVEY RESULTS

### 5.1 Desk Study

- 5.1.1 The site is located on a wooded residential lane with scattered deciduous woodland (NERC 2006 Section 41 priority habitat) which constitutes high quality flight paths and foraging habitat for any bats roosting locally.

Bat mitigation licences that have been granted within the last 10 years inside a 2km radius of the 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)
2014-4890-EPS-MIT-2	Brown long-eared bat	2015	Destruction of resting place	~200N
2014-3970-EPS-MIT-1	Brown long-eared bat Common pipistrelle	2017-2022	Damage of resting place	~520W
2019-39174-EPS-MIT	Brown long-eared bat Common pipistrelle Soprano pipistrelle	2019-2029	Damage of breeding site & resting place	~810S
2015-9568-EPS-MIT-1	Common pipistrelle	2016-2020	Destruction of resting place	~820NW
2019-44291-EPS-MIT	Common pipistrelle Soprano pipistrelle	2020	Damage of resting place	~1010S
2020-45340-EPS-MIT	Brown long-eared bat	2020-2025	Destruction of resting place	~1265E
2015-18339-EPS-MIT-1 2015-18339-EPS-MIT	Common pipistrelle	2016-2021	Destruction of resting place	~1470W
2017-31789-EPS-MIT	Soprano pipistrelle	2017-2018	Destruction of resting place	~1650E
2018-33861-EPS-MIT	Brown long-eared bat	2018	Destruction of resting place	~1665E
2019-40646-EPS-MIT	Nathusius' pipistrelle	2019-2024	Destruction of resting place	~1840S
2018-37292-EPS-MIT	Brown long-eared bat Common pipistrelle Soprano pipistrelle	2018-2028	Destruction of breeding site & resting place	~1940SE

- 5.1.3 A Bat Emergence Survey report was prepared by GS Ecology for the property at Woodlands in 2023 to support a householder application (Planning ref.: 230611). The bat survey identified a total of five bat roosts comprising three soprano pipistrelle (*Pipistrellus pygmaeus*) and two common pipistrelle (*Pipistrellus pipistrellus*) day roosts;

have been obtained for works that have been carried out.

## 5.2 Building Inspection

### *Overview*

- 5.2.1 The findings from the external and internal inspections carried out for the garage are described with photographs, as follows:

### *External Survey*

- 5.2.2 The garage was a dilapidated Nissen hut with a prefabricated concrete asbestos roof, timber double doors and single-skin cladding (**Photographs 1-4**).



Photograph 1. Site viewed from Wick Hill Lane.



Photograph 2. Front of garage viewed from west.



Photograph 3. Side of garage viewed from south.



Photograph 4. Rear of garage viewed from east.

- 5.2.3 The concrete asbestos roof provided no potential roosting sites for bats, but there were holes that led directly inside the garage (**Photograph 5**). There was dense ivy (*Hedera helix*) growing over the roof which did not provide any suitable crevices for any opportunistic use by roosting bats.
- 5.2.4 The single-skin cladding at the front and rear ends of the garage offered no potential roosting opportunities to bats. The double doors were open at the time of survey and

there was a large hole above the door frame that led directly inside the garage (**Photograph 6**).



*Photograph 5. Concrete asbestos roof (side elevation).*



*Photograph 6. Large hole above door frame (front elevation).*

**5.2.5** No evidence of bat presence was identified during the external inspection.

#### *Internal Survey*

**5.2.6** The inside of the garage was one open space that had previously been used for storage (**Photograph 7**). The floor was bare ground and the ceiling was the underside of the concrete asbestos roof (**Photograph 8**). The garage interior featured no suitable roosting sites for bats.



*Photograph 7. Garage interior.*



*Photograph 8. Garage interior.*

**5.2.7** No evidence of bat presence was identified during the internal inspection.



## **6 DISCUSSION**

### **6.1 Assessment of Roost Suitability**

**6.1.1** The site is located on a wooded residential lane with scattered deciduous woodland (NERC 2006 Section 41 priority habitat) which constitutes high quality flight paths and foraging habitat for any bats roosting locally. Eleven bat mitigation licences have been granted within a 2km radius covering four species – brown long-eared bat (*Plecotus auritus*), common pipistrelle (*Pipistrellus pipistrellus*), Nathusius' pipistrelle (*Pipistrellus nathusii*) and soprano pipistrelle (*Pipistrellus pygmaeus*) – and at least two breeding sites. The adjacent property, Woodlands, had five bat roosts in 2023 consisting of common pipistrelle (*P. pipistrellus*) and soprano pipistrelle (*P. pygmaeus*).

**6.1.2** The garage's prefabricated concrete asbestos roof and single-skin cladding does not possess any potential roosting sites for bats. The dense ivy (*Hedera helix*) growing across the roof does not provide any suitable crevices for any opportunistic use by roosting bats. Therefore, the garage has been classified as negligible suitability (see **Appendix 1** for potential suitability categories).

**6.1.3** Based on the above assessment, no further survey to determine the presence or likely absence of roosting bats (i.e. emergence survey) is deemed necessary.

### **6.2 Impact Assessment and Recommended Actions**

**6.2.1** The development proposals, involving the demolition of the existing garage, are considered highly unlikely to result in the damage and/or destruction of a bat roost or cause disturbance, injury and/or death of bats. Therefore, a European Protected Species (EPS) mitigation licence would not be required for the works to proceed lawfully.

**6.2.2** In the unlikely event that bats are encountered during the works, works must stop immediately and a suitably licensed ecologist should be called to site attend to the bat and provide advice on how to proceed; works should not continue until further written advice has been received. At this stage, an EPS mitigation licence may be required to permit the works to recommence lawfully.

## 7 REFERENCES

CIEEM (2019). *Advice Note on the Lifespan of Ecological Reports and Surveys*. CIEEM, Winchester.

Collins, J. (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4<sup>th</sup> edition)*. The Bat Conservation Trust, London.

Mathews F., Kubasiewicz L.M., Gurnell J., Harrower C.A., McDonald R.A., Shore R.F. (2018). *A Review of the Population and Conservation Status of British Mammals*. A report by the Mammal Society under contract to Natural England, Natural Resources Wales and Scottish Natural Heritage. Natural England, Peterborough.

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

Reason, P.F. and Wray, S. (2023). *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats*. CIEEM, Ampfield.

## 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 (4<sup>th</sup> 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 (4<sup>th</sup> 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.