

66 St Peters Road
Earley
Reading
RG6 1PH

Preliminary Roost Assessment

Report ref.: R3617/a

<i>Report Quality Control Information</i>	
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1	EXECUTIVE SUMMARY	3
2	INTRODUCTION.....	4
2.1	Project Background	4
2.2	Site Location and Context	4
2.3	Legislative Background	4
3	SURVEY METHODOLOGY.....	7
3.1	Desk Study.....	7
3.2	Building Inspection	7
3.3	Survey Constraints	8
4	SURVEY FINDINGS	9
4.1	Desk Study.....	9
4.2	Building Inspection	9
5	DISCUSSION AND RECOMMENDATIONS	11
5.1	Assessment of Bat Roost Status	11
5.2	Impact of Proposals and Recommendations	12
5.3	Indicative and Provisional Mitigation Proposals.....	12
6	REFERENCES.....	14
	APPENDIX 1 – SITE PHOTOGRAPHS	15
	APPENDIX 2 – PRELIMINARY ROOST ASSESSMENT PLAN.....	18
	APPENDIX 3 – EXISTING AND PROPOSED ELEVATIONS	19

1 EXECUTIVE SUMMARY

1.1.1 John Wenman Ecological Consultancy LLP was commissioned by Mr and Mrs Miller to conduct a Preliminary Roost Assessment (PRA) for bats at 66 St Peters Road in Earley, Reading (OS grid reference: SU 74327 72409). The PRA was commissioned to accompany a planning application to be submitted to Reading Borough Council seeking consent for a loft conversion including changing the hip roof to a gable roof, with the addition of a rear dormer and two front roof lights. The aim of the PRA is to determine the actual or potential presence of bats at the property and whether further survey and/or mitigation is required.

1.1.2 All wild bat species are fully protected in England and Wales by the Wildlife & Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 ('Habitat Regulations') (as amended). A desk study, utilising open access data (i.e. MAGIC and the LPA's planning portal), found six granted EPSL licenses within a 2-kilometre radius of the property.

1.1.1 A detailed inspection of the exterior and interior of the property was undertaken on the 27th November 2023 by Vicky Potts MCIEEM registered under Natural England Bat Survey Class Licence CL18 and Meghan Porter registered under Natural England Bat Survey Class Licence CL17. No bat droppings or signs of roosting bats (i.e. odour, staining, noise) were found after a systematic search inside the loft space of the property. Externally the property had several features with potential for use as roosts by crevice-dwelling bat species. Taking into account the urban setting and the property's proximity to nearby good quality foraging habitat, it has been assigned moderate potential suitability for roosting bats, specifically crevice-dwelling species.

1.1.2 The survey findings demonstrate that the planning proposals will remove potential roosting sites for crevice-dwelling bat species, which could result in the destruction of a bat roost(/s) and in the absence of mitigation, lead to disturbance and/or harm of bats if present at the time of the works. Further survey, comprising two dusk emergence survey visits during May to August inclusive, is required to determine the presence or likely absence of roosting bats within the property.

1.1.3 If a bat roost(/s) is confirmed by further survey, a European Protected Species (EPS) mitigation licence or the registration of the site under the low impact Bat Mitigation Class Licence WML-CL21 (BMCL) (if applicable) may be required to permit the work to proceed lawfully.

2 INTRODUCTION

2.1 Project Background

- 2.1.1** John Wenman Ecological Consultancy LLP was commissioned by Mr and Mrs Miller to conduct a Preliminary Roost Assessment (PRA) for bats at 66 St Peters Road in Earley, Reading.
- 2.1.2** The PRA was commissioned to accompany a planning application to be submitted to Reading Borough Council seeking consent for a loft conversion including changing the hip roof to a gable roof, with the addition of a rear dormer and two front roof lights (refer to existing and proposed elevations in **Appendix 3**).
- 2.1.3** The aim of the PRA is to determine the actual or potential presence of bats at the property and whether further survey and/or mitigation is required.

2.2 Site Location and Context

- 2.2.1** The property is a residential house located on the southern side of St Peters Road in Earley, Reading (OS grid reference: SU 74327 72409).
- 2.2.2** The property is in an urban setting surrounded by other residential properties and gardens. A treeline bordering the railway line is present approximately 135 metres to the east of the site, which connects to Sol Joel Park – an area of open grassland surrounded by a mature tree line approximately 350 metres to the south-east of the site. Approximately 425 metres east of the site is deciduous woodland beside a large allotment and connected to High Wood – an ancient and semi-natural woodland. The University of Reading Whiteknights Campus is present approximately 500 metres west of the site, with a large lake, woodland, parkland and wood-pasture present within the campus grounds.
- 2.2.3** The habitats in the vicinity of the site provide high quality foraging and commuting habitat suitable for use by bats adapted to roosting in urban environments.

2.3 Legislative Background

- 2.3.1** All bat species are fully protected in England and Wales by the Wildlife & Countryside Act 1981 (as amended) and by The Conservation of Habitats and Species Regulations 2017 (as amended) (*'Habitat Regulations'*). In summary, the legislation combined makes it an offence to:

- Damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a bat;
- Deliberately, intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair the ability of bats to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species; and
- Deliberately kill, injure or take any bat.

2.3.2 The government's statutory conservation advisory organisation, 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. A licence can be issued if the following three tests have been met:

- **Regulation 55(9)(a)** - there is "no satisfactory alternative" to the derogation;
- **Regulation 55(9)(b)** - the derogation "will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range"; and
- **Regulation 55(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".

2.3.3 Local Planning Authorities (LPAs) have a statutory duty under Regulation 7(3e) of the Habitat Regulations to have regard to requirements of the Habitats Directive in the exercise of their functions. The LPA must therefore consider and determine whether these three tests are likely to be satisfied by planning proposals affecting EPS before granting planning permission.

2.3.4 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.

2.3.5 Licensable projects affecting small numbers of seven commonly occurring species occupying roosts of low conservation importance may fall under the remit of the low impact Bat Mitigation Class Licence WML-CL21 (BMCL), which would enable consultants registered by Natural England, or accredited agents appointed by them,

to carry licensable work under the BMCL once sites have been registered in advance with Natural England. Registration forms must be submitted at least three weeks before work is due to start, and if acceptable, Natural England aims to register sites within two weeks.

- 2.3.6** Survey data supporting EPS mitigation licence applications or the registration of the site under the BMCL must be up to date, i.e. have been conducted within the current or most recent optimal survey season, i.e. May to August. Therefore, if surveys show bats are present and licensable work is delayed until during or after the next survey season, updated surveys will be required to support an application or site registration.

3 SURVEY METHODOLOGY

3.1 Desk Study

3.1.1 A desk-based study utilising open access data was undertaken for the property and land within a 2-kilometre radius. The study used the Local Planning Authority's (LPA) online planning portal, to find any pre-existing bat survey reports submitted with previous planning applications for the property, and the MAGIC website to examine granted European Protected Species (EPS) mitigation licences for bats in the surrounding area.

3.2 Building Inspection

3.2.1 A detailed inspection of the exterior and interior of the property was undertaken on the 27th November 2023 by Vicky Potts MCIEEM – registered under Natural England Bat Survey Class Licence CL18 (Registration no.: 2016-27162-CLS-CLS) and Meghan Porter – registered under Natural England Bat Survey Class Licence CL17 (Registration no.: 2023-11300-CL17-BAT).

3.2.2 The survey was undertaken with the aid of binoculars and a high power (1 million candle power) torch, systematically searching for signs of bat occupation and features that could offer potential roosting sites following standard survey guidance (Collins 2023; Mitchell-Jones & McLeish 2004; Reason & Wray 2023).

3.2.3 The following signs may indicate the presence of a bat roost within a building:

- Bat droppings (these can be found externally, especially in sheltered areas such as window sills, underneath roost entrances or internally within a roof space);
- Piles of insect remains, e.g. moth wings, which may be indicative of regular feeding sites used by species such as brown long-eared bat;
- Staining at roost entrances or within the roost (urine and oil from fur can leave stains on timbers when bats are gathered for long periods); and
- Bats (live or dead).

3.2.4 Residential buildings may offer potential roosting sites in a number of locations; favoured locations include:

- Under roof, ridge and hip tiles, especially when loose or lifted tiles are present, or sections of mortar are missing;
- Under sections of raised lead flashing;

- At the gable ends – access is typically gained at the roof apex via gaps in the soffits or under roof tiles;
- At the eaves – gaining access via gaps between the soffits and wall; and
- Within an enclosed roof space – brown long-eared bats for example will often cluster at the ridge beam.

3.3 Survey Constraints

3.3.1 There were no significant constraints because full external and internal access was available during the survey. The weather conditions were overcast with and an air temperature of 10°C.

3.3.2 It should be noted that it is not always possible to inspect all potential roost locations during a survey, particularly for crevice-dwelling bats which roost behind roof lining and inside wall cavities. Therefore, an absence of bat evidence does not necessarily equate to evidence of bat absence.

4 SURVEY FINDINGS

4.1 Desk Study

- 4.1.1** The Local Planning Authority's (LPA) online planning portal had previous planning applications for the property but no previous bat surveys had been conducted.
- 4.1.2** Six bat mitigation licences have been granted within a 2-kilometre radius of the property for three different species. The nearest licence, approximately 507m south-west of the property, covered the destruction of a common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*) resting place between 2012 and 2016 (Case ref.: EPSM2012-4478). The next closest licence, approximately 769m north-east of the site, covered the damage and destruction of resting places used by common pipistrelle (*P. pipistrellus*) and soprano pipistrelle (*P. pygmaeus*) between 2014 and 2019 (Case ref.: 2014-441-EPS-MIT). The third closest licence, approximately 946m west of the property, covered the destruction of resting places used by common pipistrelle (*P. pipistrellus*) between 2010 and 2012 (Case ref.: EPSM2010-2126). The next closest license was for a building situated just over 1km to the west of the site and covered the destruction of a breeding and resting site for brown long-eared (*Plecotus auritus*) and common pipistrelle (*P. pipistrellus*) bats between 2010 and 2011 (Case ref.: EPSM2010-2266).

4.2 Building Inspection

Overview

- 4.2.1** Photographs of the property are presented in **Appendix 1** and a plan of the external and internal survey findings with associated target notes is shown in **Appendix 2**. The survey findings from the exterior and interior of the property are described as follows:

External Survey

- 4.2.2** The property was a semi-detached property of traditional rendered blockwork construction with a hipped roof, a small front pitched gable and a second storey rear hipped extension; there was a single storey flat roof extension on the rear elevation and a garage was present on the northern side (**Photographs 1 & 2**).
- 4.2.3** The roof was covered with overlapping clay roof tiles that were mostly flat on the main hipped roof with occasionally slightly lifted tiles, and there were lifted and

damaged tiles on the rear extension hipped roof, presenting potential ingress/egress opportunities to roosting bats (**Photographs 3 & 4; Target notes 1 & 2**). There were gaps below the hip tiles on the rear and front elevation of the main hipped roof, also presenting potential access and roosting opportunities to crevice-dwelling bats (**Photographs 5 & 6; Target note 3**). There was a gap below the ridge tile adjacent to the chimney (**Photograph 7; Target note 4**). There was a slight gap in the verge mortar on the front pitched gable and the soffit was tight to the gable wall (**Photograph 8; Target note 5**). The soffit was tight to the pebble-dashed rendered wall around the eaves of the second storey roof (**Photograph 9; Target note 6**). The garage roof had flat and intact roof tiles, with tight timber cladding present on the front elevation of the garage (**Photographs 10 & 11; Target notes 7 & 8**).

- 4.2.4** No signs of roosting bats were observed during the external inspection.

Internal Survey

- 4.2.5** The roof void was accessible via a loft hatch on the first floor. The void had a floor-to-ridge height of approximately 3m, was of hipped roof construction with a brickwork party wall on the southern side of the void and ridge beam which was cobwebbed throughout (**Photograph 12; target note 9**). The main roof was lined with timber sarking and the underside of roof tiles was visible in places between the boards (**Photograph 13; Target note 10**). The rear hipped roof extension was lined with intact hessian reinforced bitumen felt (**Photograph 14; Target note 11**). The brickwork party wall was cobwebbed and had occasional gaps over the bricks (**Photograph 15; Target note 12**). There were two chimneys present on the party wall which were cobwebbed, and had a small wasp nest present on the side (**Photograph 16; Target note 13**). The void was centrally boarded, with large amounts of fibreglass insulation present around the edge of the void (**Photograph 17; Target note 14**). The eaves were open in places within the main void, with the eaves blocked by fibreglass insulation in the rear hipped roof (**Photograph 18; Target note 15**).

- 4.2.6** No evidence of bats was found after a systematic search of the roof void.

5 DISCUSSION AND RECOMMENDATIONS

5.1 Assessment of Bat Roost Status

- 5.1.1** No bat droppings or signs of roosting bats (i.e. odour, staining, noise) were found after a systematic search inside the loft space of the property. Furthermore, the heavily cobwebbed ridge beam and absence of scattered bat droppings inside the roof void typically deposited by bats that tend to roost within roof voids (i.e. long-eared bats and *Myotis* species), indicates that no internal flight, prior to emerging from a roost, had taken place. Therefore, it is considered highly unlikely that these bat species are present in the property.
- 5.1.2** The main roof inside the loft space was covered in timber sarking with no roofing felt/membrane behind; there were occasional gaps between sarking boards which exposed the underside of roof tiles in places but no evidence of bat presence was discovered. The rear hipped roof was lined with intact roofing felt and therefore any evidence of bat presence would be hidden from view. Externally, the property had several potential bat access and roosting points in the form of missing hip mortar below the hip tiles on the main roof, gap below a ridge tile beside the chimney, occasionally lifted roof tiles on the rear hipped roof and a slight crack in the verge mortar on the front gable.
- 5.1.3** The features noted resemble potential roosting sites suitable for use by crevice-dwelling species (i.e. pipistrelle bats and small *Myotis* species). The potential roosting sites were not able to be fully inspected as they were internally blocked by timber sarking or roofing felt. Taking into account the urban setting and the property's proximity to nearby foraging and commuting habitat, it has been assigned moderate potential suitability for roosting bats, specifically crevice-dwelling species.
- 5.1.4** The crevice-dwelling common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus 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 one of 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).

5.2 Impact of Proposals and Recommendations

- 5.2.1** The planning proposals seek consent for a loft conversion including changing the hip roof to a gable roof, with the addition of a rear dormer and two front roof lights (refer to existing and proposed elevations in **Appendix 3**).
- 5.2.2** The survey findings demonstrate that the planning proposals will remove potential roosting sites suitable for crevice-dwelling bat species and therefore could result in the destruction of a bat roost(/s) and in the absence of mitigation, lead to disturbance and/or harm of any bats if present at the time of the works. Further survey is required to determine the presence or likely absence of roosting bats in the property.
- 5.2.3** In accordance with Bat Surveys for Professional Ecologists: Good Practice Guidelines, further survey for structures with moderate potential suitability for roosting bats should comprise at least two dusk emergence survey visit during May to August inclusive separated by three weeks (Collins 2023). If the dusk emergence survey confirms bat presence, additional survey visits may be required to characterise the bat roost(/s).
- 5.2.4** If a bat roost(/s) is confirmed by further survey, a European Protected Species (EPS) mitigation licence or the registration of the site under the low impact Bat Mitigation Class Licence WML-CL21 (BMCL) (if applicable) may 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 2.2.2**) have been met by the proposals.
- 5.2.5** To meet one of the licensing tests, it is necessary to demonstrate that the 'favourable conservation status' of bats using the property is maintained throughout and after the completion of the work by employing mitigation measures during the work, providing compensatory roosts in the short-term and ensuring that roosting sites are retained on site in the long-term. Indicative and provisional mitigation proposals are summarised in **Section 5.3** below. **N.B. the preparation of a detailed mitigation strategy necessary for the submission of an EPS mitigation licence or BMCL should be based on the findings of further survey.**

5.3 Indicative and Provisional Mitigation Proposals

- 5.3.1** If further survey demonstrates that an EPS mitigation licence is required, under the terms of the full licence or BMCL (if applicable), the commencement of work affecting

a bat roost(/s) would be timed to avoid the periods when bats are most susceptible to disturbance, i.e. winter hibernation season where there is potential for hibernating bats (mid-November to February inclusive) to avoid disturbing torpid bats, and outside of the peak summer breeding season (May to mid-September inclusive) where evidence of a maternity roost is recorded.

- 5.3.2** Replacement roosting opportunities would be provided so that they are available to bats in the short-term, i.e. before and during the work by erecting at least one woodcrete bat box (suitable for the roosts/species present) on a mature tree or a purpose-built pole before the work starts.
- 5.3.3** Before the licensable work commences, a licensed ecologist or Registered Consultant under the BMCL would provide a toolbox talk to contactors on site detailing that bats are present, the legislation protecting bats, the location of the roosting site(/s), good working practices, the measures that are required to protect bats during the work and what to do if bats are found.
- 5.3.4** A 'soft strip' approach to the work affecting the confirmed roost(/s) would be adopted, i.e. the careful removal of roof coverings associated with the roost(/s), by gloved hands and with hand-held tools under the supervision of a licensed ecologist or the Registered Consultant if working under the BMCL. In the event that a bat(/s) are discovered during the course of the work, the licensed ecologist or Registered Consultant would capture the bat(/s) and transfer it(/them) directly to the bat box erected in advance of the works.
- 5.3.5** In the long-term, replacement access and/or roosting opportunities may need to be created and/or reinstated into the property as part of an EPS mitigation licence or BMCL. Access and roosting opportunities should be created corresponding as closely as possible to the positioning of access points/roosting sites identified during the further survey. **N.B. bituminous roofing felt that does not contain polypropylene/polyethylene filaments, such as bitumen felt type 1F, or a non-bitumen coated 'breathable' membrane that has passed the snagging propensity test, such as TLX 'Bat Safe', should be used; other non-bitumen coated membranes are harmful to bats and must be avoided.**

6 REFERENCES

Collins, J (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th 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 (3rd 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*. Chartered Institute of Ecology and Environmental Management, Ampfield.

APPENDIX 1 – SITE PHOTOGRAPHS



1. Front of property viewed from north.



2. Rear of property viewed from south.



3. Occasionally lifted roof tiles (front elevation).



4. Lifted and uneven roof tiles (rear elevation).



5. Gaps below hip tiles (rear elevation).



6. Gaps below hip tiles (front elevation).



7. Missing mortar below ridge tile by chimney (rear elevation).



8. Crack in verge mortar on gable (front elevation).



9. Soffit tight to rendered wall (south elevation).



10. Intact hip mortar and flat roof tiles (rear elevation).



11. Tight timber cladding on garage (front elevation).



12. Cobwebbed ridge (roof void).



13. Intact timber sarking (roof void).



14. Intact hessian reinforced bitumen felt (roof void).



15. Cobwebbed brickwork party wall (roof void).



16. Cobwebbed chimney with small wasp nest on brickwork (roof void).

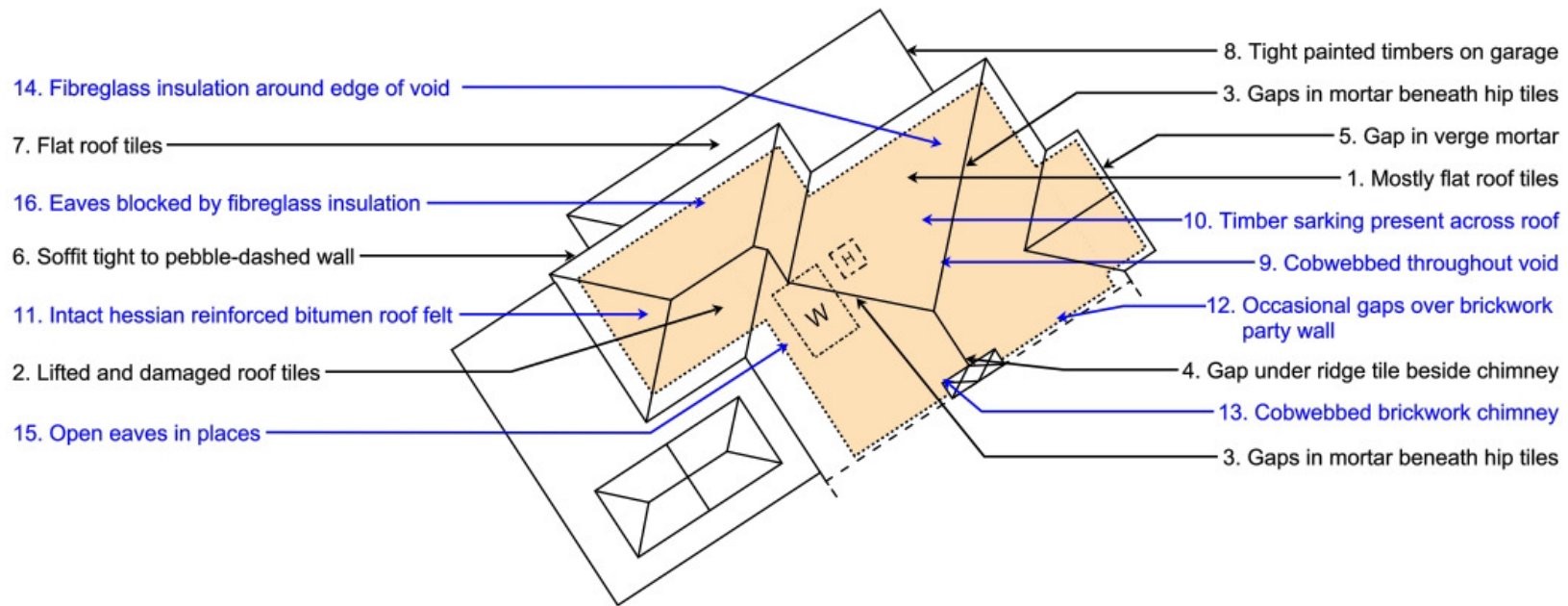


17. Part open eaves (roof void).



18. Eaves blocked by fibreglass insulation in rear hipped roof (roof void).

APPENDIX 2 – PRELIMINARY ROOST ASSESSMENT PLAN



n. External target note **n.** Internal target note Roof void Water tank Loft hatch

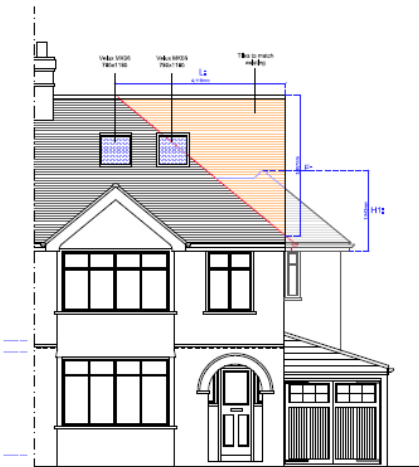
Drawn by:	Date:	Scale:	66 St Peters Road, Reading RG6 1PH	
MP	December 2023	Not to scale	Preliminary Bat Roost Assessment Findings	

John Wenman Ecological Consultancy
12/12/2023

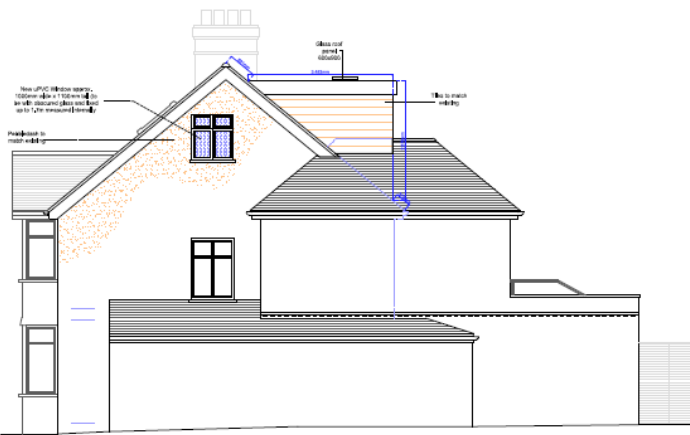
APPENDIX 3 – EXISTING AND PROPOSED ELEVATIONS



Proposed Front and Side Elevation A _ scale 1:50 @ A1



PROPOSED FRONT ELEVATION



PROPOSED SIDE ELEVATION -A-

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Any alterations to be requested by The Loft Room Ltd prior to printing and in writing only.

Notes:

All new materials to match existing.

All new glass windows to be obscure-glassed and fixed shut up to 1.7m above internal floor level.

All roof lights should not project by more than 150mm above the roof slope.

No part of the proposed development should be higher than the highest ridge level.

Proposed staircase is shown as a guide. Exact layout and dimensions to be confirmed by the staircase company and the Building Control on site.

New casement window glass to be confirmed with client on site.

Plans may change after Contract is signed subject to Final Design and Specific Structural Engineer Specifications.

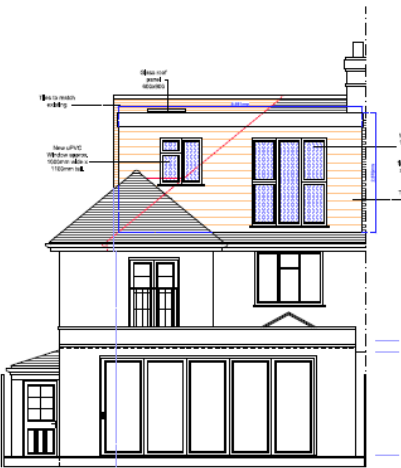
The Contractor should check all dimensions on site prior to ordering materials or fixing any steel beams/ timber joists.

Exact position and size of all chimney stacks/breasts to be confirmed on site prior to ordering materials. In case the proposed structure is affected, the Contractor should report back to the Engineer or Architect.

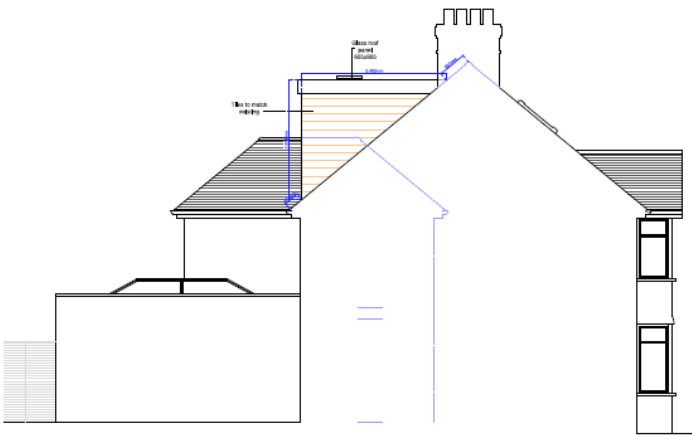
General Notes on Layout and Furniture:

Please note furniture, beds, shelves and equipment shown are for illustration purposes only and are not included in the Contract UNLESS PREVIOUSLY AGREED and/or OTHERWISE SPECIFIED on plans.

Proposed Rear and Side Elevation B _ scale 1:50 @ A1



PROPOSED REAR ELEVATION



PROPOSED SIDE ELEVATION -B-

0 1m 2m 3m 4m 5m
Scale Bar @ 1:50

0 1m 2m 3m 4m 5m
Scale Bar @ 1:50

THE LOFT ROOM
- BUILDING ABOVE THE REST -

11 West Colindale Avenue, London NW9 1ST
Registered Office: Colindale Avenue, 11 West Colindale Avenue, London NW9 1ST

Project:

HP170 GABLE REAR DOWNER LOFT CONVERSION AT
86 ST PETERS ROAD
READING
RG6 5PH

Site:

86 St Peters Road
86 ST PETERS ROAD
READING
RG6 5PH

Drawing No:

PROPOSED ELEVATIONS

Scale:	Drawn:	Checked:	Authorised:
1:50 @ A1			
1:50 @ A1			

Drawing Number: LFR_23_66STPETERSRD_plan_34 Date: C