

**Garages at 9 Eldon Square
Reading
Berkshire
RG1 4DP**

Preliminary Bat Roost Assessment

Ref: R3075/b

Report prepared by Meghan Porter; reviewed by John Wenman

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1 EXECUTIVE SUMMARY

- 1.1.1** John Wenman Ecological Consultancy LLP was commissioned by Dr and Mrs D'Cruz to undertake a preliminary bat roost assessment of garages to the rear of 9 Eldon Square in Reading, Berkshire (OS grid reference: SU 72488 73159). The assessment was commissioned to accompany a planning application to be submitted to Reading Borough Council seeking consent for the erection of a new double storey dwelling, following the demolition of the existing garages.
- 1.1.2** All British bat species are fully protected by the Wildlife & Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 ('Habitat Regulations') (as amended). A survey of the interior and exterior of the buildings was conducted on the 28th March 2022 by an ecologist registered under the Natural England Bat Survey Class Licence CL18.
- 1.1.3** The garages showed no evidence of the presence of roosting bats. The garages lacked an enclosed roof void and bat droppings were absent, which indicates that primarily void-dwelling species, such as the long-eared bat (*Plecotus* spp.), are highly unlikely to be present. The existing garages and attached timber frame lean-to lacked external features suitable for use by crevice-dwelling bats, such as pipistrelle (*Pipistrellus* spp.) and/or small *Myotis* species.
- 1.1.4** The garages showed no signs of used by bats and lacked suitable bat roost features, and as such, the proposed demolition work is considered highly unlikely to lead to the disturbance of bats or lead to the loss of a bat roost and therefore, a European Protected Species Mitigation Licence (EPSML) would not be required to allow the works to go ahead lawfully.
- 1.1.5** In the unlikely event that bats are encountered during the course of the construction work, the work must stop immediately and a licensed ecologist should be called to site to attend to the bat(s) and provide further advice on how to proceed; work must continue only once further written advice has been received. At this point, an EPSML may be required to permit the work to continue lawfully.

2 INTRODUCTION

2.1 Background

2.1.1 John Wenman Ecological Consultancy LLP was commissioned by Dr and Mrs D'Cruz to undertake a preliminary bat roost assessment of garages to the rear of 9 Eldon Square in Reading, Berkshire.

2.1.2 The assessment was commissioned to accompany a planning application to be submitted to Reading Borough Council seeking consent for the erection of a new two-storey dwelling following the demolition of the existing garages.

2.2 Legislative Background

2.2.1 All British bat species are fully protected by the Wildlife & Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 ('Habitat Regulations') (as amended). 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 significantly affect the local distribution or abundance of the species; and
- Deliberately kill, injure or take any bat.

2.2.2 The government's statutory conservation advisory organisation, Natural England, is responsible for issuing European Protected Species Mitigation Licences (EPSML) 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”.

2.2.3 Local authorities 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 Council must therefore consider and determine whether these three tests are likely to be satisfied by applications where survey findings show that an EPSML is necessary before granting planning permission.

2.2.4 EPSML applications can be submitted once all necessary planning consents have been granted and Natural England aim to issue a licence decision within 30 working days.

2.2.5 Licensable projects affecting small numbers of seven commonly occurring species occupying roosts of low conservation importance may fall under the remit of the Bat Mitigation Class Licence WML-CL21 (BMCL). The BMCL permits ‘Registered Consultants’ or accredited agents appointed by them to carry out licensable operations on site on behalf of clients following the registration of sites with Natural England at least 15 working days before the work is due to start.

2.2.6 Survey data supporting EPSML 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.

2.3 Site Location and Context

2.3.1 The garages are located to the rear of 9 Eldon Square, accessed on the southern side of Eldon Terrace, in Reading, Berkshire (OS grid reference: SU 72488 73159).

2.3.1 The garages are set in an urban area with other residential properties on all sides. The River Kennet is situated approximately 260 metres to the north of the site with trees lining the water-way. There are nearby tree-lined open green spaces approximately 75 metres and 360 metres to the south-east and 260 metres to the south-west of the site. These nearby riverine and tree-lined open habitats offer high

quality commuting and foraging opportunities to bats adapted to living in urban environments.

3 SURVEY METHODOLOGY

3.1 Building Inspection

- 3.1.1** A survey of the interior and exterior of the buildings was conducted on the 28th March 2022 by John Wenman - an ecologist registered under the Natural England Bat Survey Class Licence CL18 (registration number 2015-11906-CLS-CLS).
- 3.1.2** The survey was undertaken with the aid of binoculars, and a high power (1 million candle power) torch, searching for any signs of occupation by bats and for features that could offer potential roosting sites following standard survey guidelines (Collins 2016; Mitchell-Jones 2004; Mitchell-Jones & McLeish 2004).
- 3.1.3** The following may indicate the presence of a bat roost within a building:
- 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 (these 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).
- 3.1.4** Storage 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;
 - Beneath lifted barge boards;
 - At the eaves – gaining access via gaps between the soffits and wall; and
- 3.2 Survey Constraints**
- 3.2.1** There were no significant survey constraints because full access was available to the interior and exterior of the garages.

4 SURVEY FINDINGS

4.1 Building Inspection

- 4.1.1** Photographs of the buildings 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 garages are described as follows:

4.2 External Survey

- 4.2.1** The row of garages was of prefabricated concrete panel construction, with a timber framed lean-to attached on the eastern elevation and a timber storage shed on the rear elevation (**Photographs 1 & 2**). The garages featured a flat roof covered with bitumen roofing felt, which was tight to the barge board on the front elevation and had superficial cobwebbed gaps on the rear elevation, which were of limited potential for use by bats (**Photographs 3 & 4; Target notes 1, 2 & 3**). There were large open gaps between concrete panels and the soffit above the blocked garage doors on the front elevation, which were closely inspected and limited suitability for bats and showed no signs of use by them (**Photograph 5; Target note 4**). The frame was tight around the metal garage door serving the interior at the eastern end of the building (**Photograph 6; Target note 5**). The timber framed lean-to at the eastern end of the garages had a corrugated plastic sheet roof covering and had slight gaps present between the timber and the concrete wall of the garage building of limited extent, which showed no evidence of the presence of bats (**Photographs 7 & 8; Target notes 6 & 7**). There was a simply constructed timber shed to the rear of the garages, at the south-eastern end, which was open to the exterior on the western side (**Photograph 9; Target note 8**).

- 4.2.2** No evidence of roosting bats was observed at the time of the external inspection.

4.3 Internal Survey

- 4.3.1** The garages had no enclosed roof void internally and were used for storage. Three of the four metal garage doors had been sealed with plasterboard internally (**Photograph 10; Target note 9**). The ceiling and walls were fully plastered, blocking the eaves and sealing the interior from the exterior, and there was a concrete floor that was partially carpeted (**Photograph 11; Target note 10**). A section of the plasterboard ceiling was damaged in the north-east side of the garage, with fibreglass insulation present and the underside of the boarded roof visible (**Photograph 12; Target note 11**).

4.3.2 No signs of roosting bats were observed during the internal inspection of the garages.

5 DISCUSSION AND RECOMMENDATIONS

5.1 Assessment of Bat Roost Potential

- 5.1.1** The building showed no evidence of the presence of roosting bats either internally within the garages or around the exterior of the building. The garages lacked an enclosed roof void and no bat droppings were found, which indicates that primarily void-dwelling species, such as the long-eared bat (*Plecotus* spp.), are highly unlikely to be present.
- 5.1.2** The garages and timber lean-tos, which are set in an urban area within Reading town centre, lacked external features suitable for use by crevice-dwelling bats, such as pipistrelle (*Pipistrellus* spp.) and/or small *Myotis* species and showed no evidence of the presence of bats. Therefore, the garages are considered to have negligible bat roost potential.

5.2 Impact of Proposals and Recommendations

- 5.2.1** The buildings showed no signs of used by bats and lacked suitable bat roost features and as such, the demolition of the garages is considered highly unlikely to lead to the disturbance of bats or lead to the loss of a bat roost and therefore, a European Protected Species Mitigation Licence (EPSML) would not be required to allow the works to go ahead lawfully.
- 5.2.1** In the unlikely event that bats are encountered during the course of the construction work, the work must stop immediately and a licensed ecologist should be called to site to attend to the bat(s) and provide further advice on how to proceed; work must continue only once further written advice has been received. At this point, an EPSML may be required to permit the work to continue lawfully.

6 REFERENCES

Collins, J. (ed.) (2016). *Bat Surveys for Professional Ecologists – Good Practice Guidelines 3rd Edition*. Bat Conservation Trust, London.

Mitchell-Jones, A. J. (2004). *Bat Mitigation Guidelines*. English Nature, Peterborough.

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

Richardson, P. (2000). *Distribution Atlas of Bats in Britain and Ireland 1980 – 1999*. Bat Conservation Trust, London.

APPENDIX 1 - SITE PHOTOGRAPHS



1. Front of garages viewed from north.



2. Rear of garages viewed from south.



3. Bitumen roofing felt covering roof (front elevation).



4. Superficial gap between the bitumen roofing felt and the barge board (rear elevation).



5. Large open gaps between soffit and concrete panels (front elevation).



6. Frame tight to metal garage door (front elevation).



7. Corrugated plastic sheeting above timber framed lean-to at the western end of the site.



8. Open gap between timber frame and concrete wall (western elevation).



9. Corrugated sheeting above timber framed storage shed.



10. Stored items in front of plastered over garage doors.

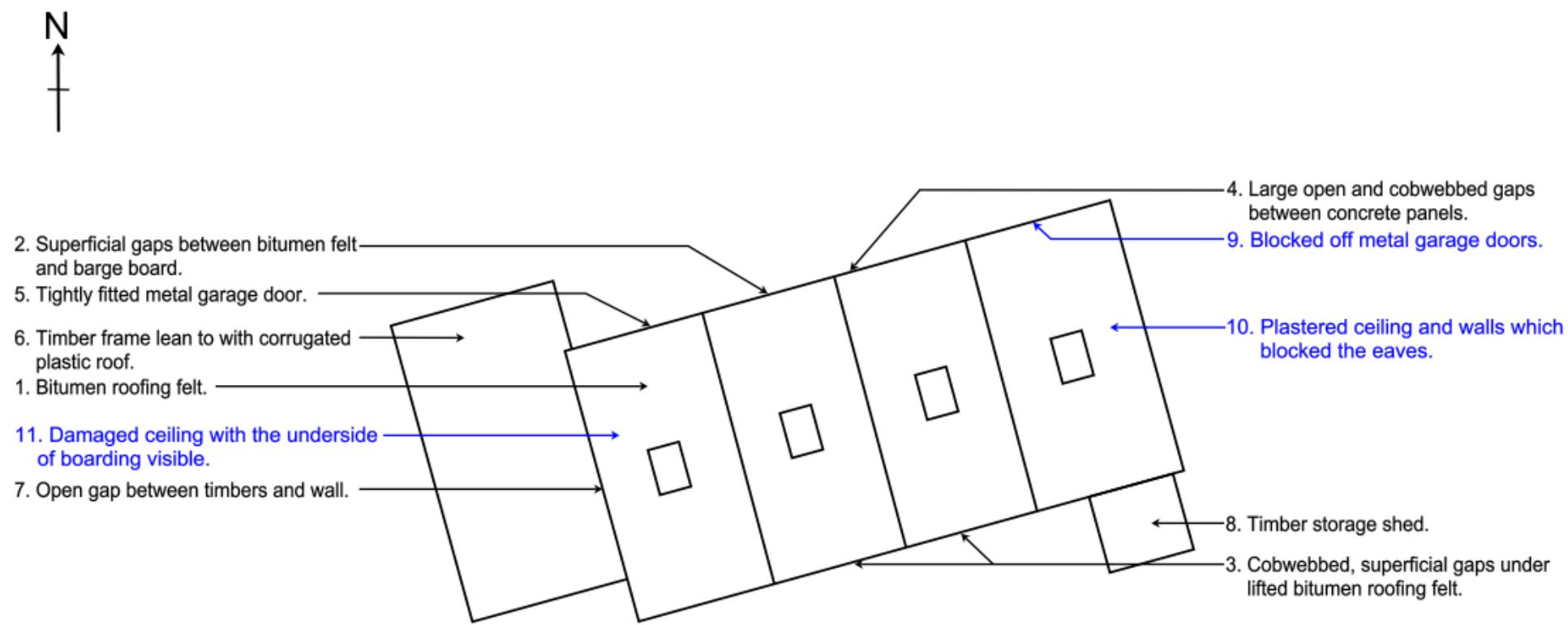


11. The ceiling and walls were fully plastered internally.



12. Gap in plasterboard ceiling with the underside of the boarded roof with fibreglass insulation visible.

APPENDIX 2 – PRELIMINARY BAT ROOST ASSESSMENT PLAN



n. External target note			n. Internal target note	
Drawn by:	Date	Scale:	Garages at 9 Eldon Square, Reading, RG1 4DP	
MP	April 2022	Not to scale	Preliminary Bat Roost Assessment Findings	

APPENDIX 3 – EXISTING AND PROPOSED SITE PLAN



John Wenman Ecological Consultancy LLP