

2 Sidmouth Street
Reading
Berkshire
RG1 4QY

Preliminary Bat Roost Assessment

Ref: R3021/a

February 2022



1 Diesel House, Honey Hill, Wokingham, Berkshire RG40 3BL
Telephone: 0118 3271810 Mobile: 07979 403099 E-mail: info@wenman-ecology.co.uk
www.wenman-ecology.co.uk

John Wenman Ecological Consultancy LLP is a limited liability partnership registered in England and Wales with registered number OC339057.
Registered office: 100 New Wokingham Road, Crowthorne, RG45 6JP where you may look at a list of members' names.

1	EXECUTIVE SUMMARY	3
2	INTRODUCTION	4
2.1	Background.....	4
2.2	Legislative Background.....	4
2.3	Site Location and Context.....	5
3	SURVEY METHODOLOGY.....	7
3.1	Building Inspection.....	7
3.2	Survey Constraints.....	8
4	SURVEY FINDINGS	9
4.1	Introduction.....	9
4.2	External Survey.....	9
4.3	Internal Survey.....	9
5	DISCUSSION AND RECOMMENDATIONS	11
5.1	Assessment of Bat Roost Status.....	11
5.2	Impact of Proposals and Recommendations	11
5.3	Indicative and Provisional Mitigation Proposals	12
6	REFERENCES	14
	APPENDIX 1 - SITE PHOTOGRAPHS.....	15
	APPENDIX 2 – PRELIMINARY BAT ROOST ASSESSMENT PLAN	19
	APPENDIX 3 – EXISTING AND PROPOSED PLANS.....	20

1 EXECUTIVE SUMMARY

- 1.1.1** John Wenman Ecological Consultancy LLP was commissioned by Turner Property to undertake a preliminary bat roost assessment at 2 Sidmouth Street in Reading, Berkshire (OS grid reference: SU 72023 73291). The preliminary roost assessment was commissioned to accompany a planning application to be submitted to Reading Borough Council seeking consent for the erection of a two-storey extension on the northern and western elevations, and the addition of a dormer window (refer to existing and proposed plans in **Appendix 3**).
- 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'). A survey of the interior and exterior of the property was conducted on the 24th January 2022 by an ecologist registered under the Natural England Bat Survey Class Licence CL17 and an assistant ecologist.
- 1.1.3** The observation of c.75 - 100 small-sized bat droppings, resembling those typically deposited by pipistrelle species (*Pipistrellus* spp.), distributed at the gable end inside the roof void indicates that the property most likely acts as a day roost used by an individual or small numbers of non-breeding pipistrelle bats (*Pipistrellus* sp.). Bat droppings can be hidden out of view inside gaps between roof coverings and linings and so a maternity roost cannot be ruled out at this stage. There were additional potential external roost features suitable for crevice-dwelling pipistrelle bats (*Pipistrellus* spp.) and small *Myotis* species under verge and hip tiles.
- 1.1.4** The survey findings demonstrate that the proposed erection of a two-storey extension would likely result in temporary damage and loss of a pipistrelle bat (*Pipistrellus* sp.) roost, and could lead to the disturbance and/or harm of any bat(s) present at the time of the work. Further survey would be required to characterise the confirmed roost and to determine if any other species/roosts are present.
- 1.1.5** If further survey confirms that the bat roost(s) will be unavoidably affected by the work, a European Protected Species mitigation licence (EPSML) or if applicable, the registration of the site under the Bat Mitigation Class licence (BMCL) will be required to permit the lawful damage/loss of a confirmed bat roost(s) and the disturbance of bats. In the long-term, as part of the licence, compensatory access and/or roosting opportunities may need to be created and/or reinstated in the property to mitigate the impacts of the proposed work on bats and their roosts.

2 INTRODUCTION

2.1 Background

2.1.1 John Wenman Ecological Consultancy LLP was commissioned by Turner Property to undertake a preliminary bat roost assessment at 2 Sidmouth Street in Reading, Berkshire (OS grid reference: SU 72023 73291).

2.1.2 The preliminary roost assessment was commissioned to accompany a planning application to be submitted to Reading Borough Council seeking consent for the erection of a two-storey extension on the northern and western elevations, and the addition of a dormer window (refer to existing and proposed plans in **Appendix 3**).

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'). 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 property is located on the western corner of Sidmouth Street and the southern side of Kennet Side in Reading, Berkshire (OS grid reference: SU 72023 73291).

2.3.1 The property is situated in Reading town centre with the River Kennet flowing to the north and surrounded by commercial and residential buildings. Forbury Gardens, a parkland with scattered trees, is situated approximately 300 metres to the northwest of the site and Kings Meadow with scattered trees is situated just under 600 metres to the north. The River Thames flows 760 metres to the north. These nearby

habitats and adjacent river provide high quality commuting and foraging opportunities for bats adapted to urban environments.

3 SURVEY METHODOLOGY

3.1 Building Inspection

3.1.1 A survey of the interior and exterior of the property was conducted on the 24th January 2022 by an ecologist registered under the Natural England Bat Survey Class Licence CL17 and an assistant ecologist.

3.1.2 The survey was undertaken with the aid of binoculars and a high power (1 million candle power) torch, searching 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:

- 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 (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 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;
- Beneath lifted barge boards;
- 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 – long-eared bats (*Plecotus* spp.) for example, will often cluster at the ridge beam.

3.2 Survey Constraints

- 3.2.1** There was full access available to the exterior of the property. The roof space was surveyed apart from the southwestern end of the roof space which had restricted access but was visible around the sides of the chimney.

4 SURVEY FINDINGS

4.1 Introduction

- 4.1.1** 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:

4.2 External Survey

- 4.2.1** The semi-detached property was of brick construction and the main roof was hipped. There was a half-pitched two-storey extension, a flat-roofed two-storey extension and flat and sloping single-storey extensions to the property (**Photographs 1 & 2**).
- 4.2.2** The pitched roof was covered in flat slate tiles that were tightly fitted, apart from under the verge tiles at the western gable end, offering potential access, and roosting opportunities for roosting bats (**Photographs 3 & 4; Target notes 1 & 2**). Gaps were present under the ridge tiles offering potential access and crevice-roosting opportunities for bats (**Photograph 5; Target note 3**). The hip tiles on the eastern side of the property had occasional lifted tiles and the hip tiles on the western side had no mortar, offering access and roosting opportunities for bats (**Photographs 6 & 7; Target notes 4 & 5**). The timber soffits were flush against the brickwork (**Photograph 8; Target note 6**). The lead flashing was tight around the central chimney (**Photograph 9; Target note 7**).
- 4.2.3** The western end of the building had a toilet block with a sloping slate roof, a bin storage area with corrugated plastic walls and roof, and a single-storey extension covered with bitumen roofing felt, which were all fitted tightly (**Photographs 10 & 11; Target notes 8, 9 & 10**). The two-storey flat roof extension was covered with tightly fitting bitumen roof felt (**Photographs 12; Target note 11**).

4.3 Internal Survey

- 4.3.1** The roof void extended into the hipped and pitched roofs of the property and was accessible via a loft hatch at the north-western end. The void had an approximate floor-to-ridge height of 2m and was of 'cut and pitch' roof construction (**Photograph 13**). The roof was lined with Tyvek breathable roofing membrane; which was mostly intact apart from around a vent and a tear was present in the western side of the roof (**Photographs 14 & 15; Target notes 12, 13 & 14**). The floor was insulated with

fibreglass which did not go as far as the eaves which were open into the soffit boxes (**Photograph 16; Target note 15**).

4.3.2 The party end wall was of single-skinned brick wall construction with gaps around the edges and a section of wall was missing and replaced with insulation boards at the eastern end (**Photographs 17 & 18; Target notes 16 & 17**). A wasp's nest was present in the north-eastern corner (**Photograph 19; Target note 18**).

4.3.3 An accumulation of approximately 75 - 100 small bat droppings, resembling those typically deposited by pipistrelle species (*Pipistrellus* spp.), were present on fibreglass insulation at the base of the party end wall and a few were also present stuck in cobwebs on the wall (**Photographs 20 & 21**).

5 DISCUSSION AND RECOMMENDATIONS

5.1 Assessment of Bat Roost Status

5.1.1 The observation of c.75 - 100 small-sized bat droppings, resembling those typically deposited by pipistrelle species (*Pipistrellus* spp.), distributed at the party end wall inside the roof void indicates that the property most likely acts as a day roost used by an individual or small numbers of non-breeding pipistrelle bats (*Pipistrellus* sp.). However, it is possible that not all of the evidence was visible inside the roof void but hidden from view behind the wall and/or roof lining, and therefore a maternity roost cannot be ruled out at this stage. The likely points of roost ingress were gaps under ridge and hip tiles above the droppings. There were additional external features providing suitable roosting opportunities for crevice-dwelling pipistrelle bats (*Pipistrellus* spp.) and small *Myotis* species, such as gaps under verge tiles on the western gable end and gaps under hip tiles lower on the roof elevations.

5.1.2 Two species of pipistrelle bat: common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*), are widespread and abundant throughout the United Kingdom (Richardson 2000). Small *Myotis* species such as the Whiskered bat (*Myotis mystacinus*) and/or Brandt's bat (*Myotis brandtii*) are widespread and common but less abundant than the pipistrelle species. Roosts supporting pipistrelle (*Pipistrellus* spp.) and/or small *Myotis* bat species are of low to moderate conservation importance (subject to the type of roost present i.e., non-breeding roosts supporting individual or small numbers of bats through to maternity roosts supporting large numbers of female bats) (Mitchell-Jones 2004).

5.2 Impact of Proposals and Recommendations

5.2.1 The survey findings demonstrate that the proposed construction of a two-storey extension and the addition of a dormer window close to where bat droppings were found (refer to existing and proposed plans in **Appendix 3**) would likely result in the temporary damage and loss of a pipistrelle bat (*Pipistrellus* sp.) roost. The proposed work could also lead to the disturbance and/or harm of any bat(s) present at the time of the work.

5.2.2 Further survey would be required to characterise the confirmed bat roost and to determine if any other species/roosts are present. Further survey should comprise three evening emergence and/or dawn re-entry surveys separated by at least two weeks between each visit. The surveys should be conducted in the period between May and September inclusive with at least two of the survey visits undertaken in the

optimal period for recording maternity roosts i.e., May to August (Collins 2016).

- 5.2.3** If further survey confirms that the bat roost(s) will be unavoidably affected by the work, a European Protected Species mitigation licence (EPSML) or if applicable, the registration of the site under the Bat Mitigation Class licence (BMCL) will be required to permit the lawful damage/loss of a confirmed bat roost(s) and the disturbance of bats. An EPSML 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.
- 5.2.4** To meet one of the licensing tests, it would be necessary to demonstrate that the 'favourable conservation status' of bats using the property would be maintained throughout and after the completion of the work by employing mitigation measures during the work, by 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.

5.3 Indicative and Provisional Mitigation Proposals

- 5.3.1** If further survey demonstrates that a EPSML is required, under the terms of the licence or BMCL (if applicable), the start of the work affecting the bat roost(s) should be timed to avoid the periods when bats are most susceptible to disturbance i.e., winter hibernation season for all roosts (mid-November to February) to avoid disturbing torpid bats and outside of the peak summer breeding season (May to mid-September) where evidence of a maternity roost is recorded.
- 5.3.2** Replacement roosting opportunities will be provided so that they are available in the short-term i.e., prior to and during the work, by erecting woodcrete bat boxes suitable for the species present on nearby mature trees before the commencement of works.
- 5.3.3** A 'soft strip' approach to the work affecting bat roosts should be adopted i.e., the careful removal of roof tiles by gloved hands and under the supervision of a licensed ecologist, or the Registered Consultant if working under the BMCL. In the event that bats 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 one of the bat boxes erected in advance of the works.
- 5.3.4** In the long-term, as part of the licence, compensatory access and/or roosting opportunities may need to be created and/or reinstated in the property. Access and roosting opportunities should be created corresponding to the positioning of bat

roosts identified during the emergence and re-entry surveys. Roost features or access points could be recreated by installing integrated roost boxes in external walls or bat access tiles in the roof. Any features incorporated into the roof of the property must **not** be lined with non-bitumen coated membranes (formerly known as breathable roofing membrane) because they have been found to be harmful to bats, and a bitumen-based Type 1 roofing felt or wooden sarking should be used instead.

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. Northern and eastern sides of the property viewed from north-east.



2. Northern and western sides of the property viewed from the north-west.



3. Slate tiles mostly flat and tight across the roof.



4. Gaps under verge tiles at the western end of the house.



5. Gaps under the ridge tiles along the southern side of the roof.



6. Occasional lifted hip tiles.



7. No mortar visible under hip tiles at the western end of the building.



8. Timber soffits flush against the brickwork.



9. Lead flashing tight around the central chimney.



10. Toilet block with a sloped slate roof, and a bin storage area with corrugated plastic wall and roof at the western end of the property.



11. Section of flat roof lined with bitumen roof at the western end of the property.



12. Flat roof extension covered with bitumen roofing felt.



13. Internal view of the roof space.



14. Gap in breathable roofing membrane around a vent.



15. Tear in breathable roofing membrane.



16. The open eaves.



17. Party end wall of single-skinned brick construction with gaps around the edges.



18. Missing brickwork at party end wall with insulation boards behind.



19. Wasp's nest present in the north-eastern corner of the roof space.

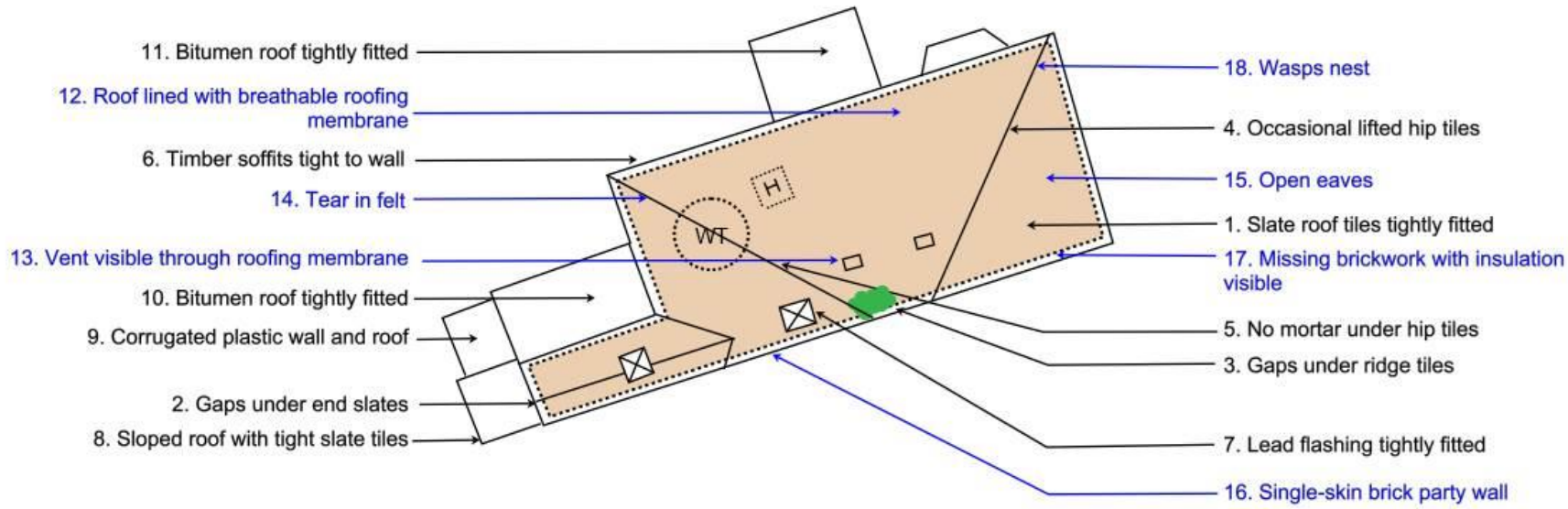


20. Accumulation of small-sized bat droppings on the insulation at the base of the party wall.



21. Few small bat droppings stuck in cobwebs at the party wall.

APPENDIX 2 – PRELIMINARY BAT ROOST ASSESSMENT PLAN



Drawn by:	Date	Scale:	2 Sidmouth Street Reading	
VP	February 2022	Not to scale	Preliminary Bat Roost Assessment Findings	

APPENDIX 3 – EXISTING AND PROPOSED PLANS



John Wenman Ecological Consultancy LLP

This drawing may be scaled with reference to the scale bar for planning application purposes only. Do not scale for any other purpose. Use only annotated dimensions. All dimensions are to be checked by parties using the drawing, and any errors or omissions are to be reported to Weston & Co Architects Ltd.

Rev.	Date	Note	Author	Checked
-	-	-	-	-



Proposed East Elevation - Street



Proposed North Elevation - Public Footpath



© Weston & Co Architects Ltd.

Project	House Refurbishment & Extension 2 Sidmouth Street RG1 4QY Reading			Drawing	Proposed Public Path & Street Elevations	
				Job-Draw Number	21009-PL-08	Rev.
Client	Turner Property Ltd			WESTON + CO ARCHITECTS westonhouse house 44 Wellington Street Reading, RG1 4QY T: 0118 355 0202 www.weston-co.com		
Status	Planning					
Scale	1/100	Sheet Size A3				
Author	IG	Checked	CTW	Date	27/09/2021	

John Wenman Ecological Consultancy LLP



John Wenman Ecological Consultancy LLP