

**31 St Anne's Road  
Caversham  
Reading  
Berkshire  
RG4 7PA**

# **Preliminary Bat Roost Assessment**

**Ref: R2950/a**

**November 2021**



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|----------|-----------------------------------------------------------------|-----------|
| <b>1</b> | <b>EXECUTIVE SUMMARY .....</b>                                  | <b>3</b>  |
| <b>2</b> | <b>INTRODUCTION .....</b>                                       | <b>4</b>  |
| 2.1      | Background.....                                                 | 4         |
| 2.2      | Legislative Background.....                                     | 4         |
| 2.3      | Site Location and Context.....                                  | 5         |
| <b>3</b> | <b>SURVEY METHODOLOGY.....</b>                                  | <b>7</b>  |
| 3.1      | Building Inspection.....                                        | 7         |
| 3.2      | Survey Constraints.....                                         | 7         |
| <b>4</b> | <b>SURVEY FINDINGS .....</b>                                    | <b>8</b>  |
| 4.1      | Introduction .....                                              | 8         |
| 4.2      | External Survey.....                                            | 8         |
| 4.3      | Internal Survey.....                                            | 8         |
| <b>5</b> | <b>DISCUSSION AND RECOMMENDATIONS .....</b>                     | <b>9</b>  |
| 5.1      | Assessment of Bat Roost Potential.....                          | 9         |
| 5.2      | Impact of Proposals and Recommendations .....                   | 9         |
| 5.3      | Indicative and Provisional Mitigation Proposals .....           | 10        |
| <b>6</b> | <b>REFERENCES .....</b>                                         | <b>12</b> |
|          | <b>APPENDIX 1 - SITE PHOTOGRAPHS.....</b>                       | <b>13</b> |
|          | <b>APPENDIX 2 – PRELIMINARY BAT ROOST ASSESSMENT PLAN .....</b> | <b>16</b> |
|          | <b>APPENDIX 3 – PROPOSED ELEVATIONS.....</b>                    | <b>17</b> |

## **1 EXECUTIVE SUMMARY**

- 1.1.1** John Wenman Ecological Consultancy LLP was commissioned by Mr and Mrs Winter to undertake a preliminary bat roost assessment at 31 St Anne's Road in Caversham, Berkshire (OS grid reference: SU 71113 74944). The assessment was commissioned to accompany a planning application submitted to Reading Borough Council seeking consent for an extension over the footprint of the existing house involving the raising of the roof and internal alterations (Planning Application Number: 211248).
- 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 26<sup>th</sup> October 2021 by an ecologist registered under the Natural England Bat Survey Class Licence CL17 and an assistant ecologist.
- 1.1.3** No evidence of roosting bats was found at the property during the assessment; however, a number of potential roost features suitable for crevice-dwelling bats, such as pipistrelle (*Pipistrellus* spp.) and small *Myotis* species, were noted externally. The potential roost features included: gaps under roof tiles along the roof valleys, near the roof hips and below the rear dormer window; gaps where mortar was absent beneath the hip tiles; and gaps behind occasionally lifted hanging tiles.
- 1.1.4** Considering the number of potential roost features, the nature of the surroundings and the absence of bat evidence, the property has been assigned moderate roost potential for crevice-dwelling bats. Consequently, proposed work may lead to the loss of (crevice) bat roosts and consequently harm and/or disturb any bats present at the time. Further survey is required to determine the presence or the likely absence of roosting bats.
- 1.1.5** A European Protected Species Mitigation Licence (EPSML) or if applicable, registration of the site under the Bat Mitigation Class Licence (BMCL) may be required to allow the planned works to go ahead lawfully. In the long-term, as part of the licence, replacement access and/or roosting opportunities may need to be incorporated into the newly altered roof.

## **2 INTRODUCTION**

### **2.1 Background**

**2.1.1** John Wenman Ecological Consultancy LLP was commissioned by Mr and Mrs Winter to undertake a preliminary bat roost assessment at 31 St Anne's Road in Caversham, Berkshire.

**2.1.2** The assessment was commissioned to accompany a planning application submitted to Reading Borough Council (RBC) seeking consent for an extension over the footprint of the existing house involving the raising of the roof and internal alterations (Planning Application Number: 211248). RBC Ecology Consultations commented that:

*'The application site comprises [a] house that may have features potentially suitable for use by roosting bats. It is proposed to extend the front hip to a gable. The site is located within habitat that matches that where bat roosts have already been discovered in the borough and is surrounded by habitat of high suitability for use by foraging and commuting bats (large connected gardens with trees, a woodland 100m to the west and the River Thames 200m south of the application site).'*

*As such, there is a risk that the proposals may affect roosting bats and a bat survey report will need to be provided before this application can be determined.'*

### **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 side of St Anne’s Road at the junction with Clifton Park Road in Caversham, Berkshire (OS grid reference: SU 71113 74944).

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**2.3.1** The property is in a suburban setting, surrounded by residential properties that have large gardens and mature trees. There is a small patch of lowland mixed deciduous woodland priority habitat approximately 65m to the west of the property, and a wooded graveyard at St Peter's Church approximately 160m to the southwest of the property. The River Thames is an important wildlife corridor and situated just over 200m to the south of the property. These nearby habitats provide good quality commuting and foraging habitat for bats roosting locally.

### **3 SURVEY METHODOLOGY**

#### **3.1 Building Inspection**

**3.1.1** A survey of the interior and exterior of the property was conducted on the 26<sup>th</sup> October 2021 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 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:

- Bat droppings (these can be found externally, especially in sheltered areas such as windowsills, 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 were no significant constraints to the survey because full access was available to the exterior and interior of the property.

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## **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 house had a hipped roof with two front gable ends, a rear dormer window and a conservatory extension (**Photographs 1 & 2**). The roof was covered in overlapping roof tiles that were mostly flat but did offer potential bat ingress in a few places (**Photograph 3; Target note 1**). The roosting opportunities under roof tiles were noted along the roof valleys, in proximity to the roof hips and below the dormer window (**Photographs 4, 5 & 6; Target notes 2, 3 & 4**). There were numerous bat access points beneath hip tiles that lacked mortar; the ridge tiles were securely mortared (**Photographs 7 & 8; Target notes 5 & 6**).
- 4.2.2** The front gable ends had ornate timber fascias and intact verge mortar; the smaller gable end had tight tongue-and-groove cladding (**Photographs 9 & 10; Target notes 7 & 8**). Vented soffits were flush against rendered walls (**Photograph 11; Target note 9**). The rear dormer window had a bituminous flat roof and was clad in lifted hanging tiles that were occasionally lifted, providing a few potential roosting opportunities for bats that typically occupy crevices (**Photograph 12; Target notes 10 & 11**).
- 4.2.3** No evidence of roosting bats was observed at the time of the external inspection.

### **4.3 Internal Survey**

- 4.3.1** The loft space of the house was converted into two en-suite bedrooms (**Photograph 13**). An eaves space was accessible through a cupboard door and insulated with hard foam (**Photographs 14 & 15; Target note 12**). There were some small contained cupboards inside the eaves space (**Photograph 16; Target note 13**). A plastered storage cupboard took up half of the large front gable end (**Photograph 17; Target note 14**).
- 4.3.2** No signs of roosting bats were observed during the internal inspection of the property.

## **5 DISCUSSION AND RECOMMENDATIONS**

### **5.1 Assessment of Bat Roost Potential**

**5.1.1** No evidence of roosting bats was found at the property during the assessment; however, a number of potential roost features suitable for crevice-dwelling bats, such as pipistrelle (*Pipistrellus* spp.) and small *Myotis* species, were noted externally. The potential roost features included: gaps under roof tiles along the roof valleys, near the roof hips and below the rear dormer; gaps where mortar was absent beneath the hip tiles; and gaps behind occasionally lifted hanging tiles. Signs of crevice-dwelling bats utilising these features (i.e., droppings) are typically hidden from view in crevices (i.e., between tiles and roof lining), and therefore the absence of roosting bats cannot be confirmed at this stage.

**5.1.2** Two species of pipistrelle bat – common pipistrelle (*Pipistrellus pipistrellus*) and soprano pipistrelle (*Pipistrellus pygmaeus*) – are widespread and abundant throughout the UK (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).

**5.1.3** Considering the number of potential roost features, the nature of the surroundings and the absence of bat evidence, the property has been assigned moderate roost potential for crevice-dwelling bats.

### **5.2 Impact of Proposals and Recommendations**

**5.2.1** The proposed extension over the footprint of the existing house may lead to the loss of crevice bat roosts and consequently harm and/or disturb any bats present at the time. Further survey is required to determine the presence or likely absence of roosting bats. Further survey should comprise two evening emergence and/or dawn re-entry surveys of the property with at least two weeks separating each survey visit. The surveys should be undertaken in the period between May and September inclusive with at least one of the surveys carried out in the peak season for recording maternity roosts i.e., mid-May to August (Collins 2016).

**5.2.2** If further survey finds that bat roosts are present, a European Protected Species

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Mitigation Licence (ESPML) or if applicable, the registration of the site under the Bat Mitigation Class Licence (BMCL) will be required to permit the lawful destruction of a confirmed bat roost(s) and/or the disturbance of bats. A Licence can be issued by Natural England if the three licensing tests (detailed in **Paragraph 2.2.2**) have been met by the proposals.

- 5.2.3** 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 shows that a EPMSL is required, under the terms of the licence or BMCL (if applicable), the commencement of work affecting 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 to bats 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, buildings or poles before the work starts.
- 5.3.3** A 'soft strip' approach to the work affecting identified bat roosts should be adopted i.e., the careful removal of roof and hip tiles 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 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, replacement access and/or roosting opportunities may need to be incorporated into the extension. 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 integral roosting boxes in external walls or installing bat access tiles in the new roof. If any roost features are to be incorporated

into the roof of the property and the roof insulation can be accessed by roosting bats, it should **not** be lined with a 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.

## 6 REFERENCES

Collins, J. (ed.) (2016). *Bat Surveys for Professional Ecologists – Good Practice Guidelines 3<sup>rd</sup> 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 (3<sup>rd</sup> 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 property viewed from southeast.



2. Rear of property viewed from west.



3. Mostly flat overlapping roof tiles (northern elevation).



4. Gaps under roof tiles along roof valley (front elevation).



5. Gaps under roof tiles near roof hip (front elevation).



6. Gaps under roof tiles below dormer window (rear elevation).



**7. Mortar absent beneath hip tiles (rear elevation).**



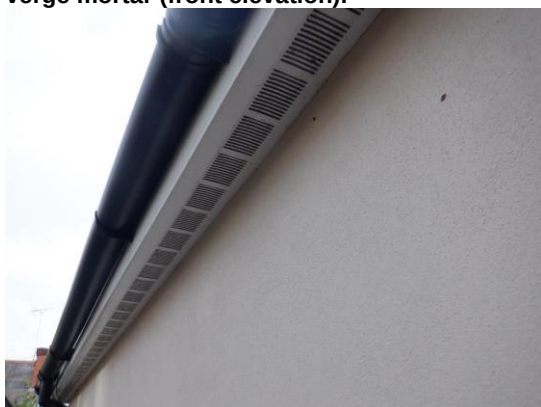
**8. Fully mortared ridge tiles (front elevation).**



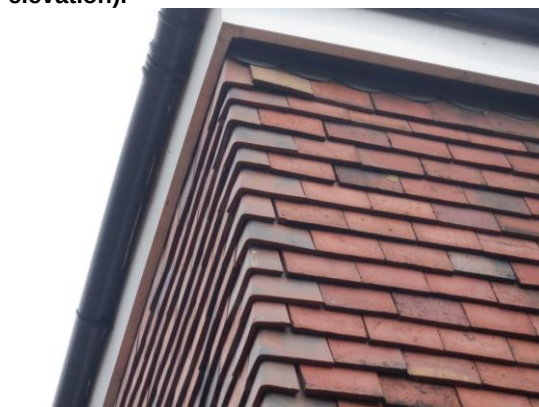
**9. Ornate timber fascia and intact gable end verge mortar (front elevation).**



**10. Tight cladding on smaller gable end (front elevation).**



**11. Flush vented soffits (northern elevation).**



**12. Gaps behind hanging tiles on dormer window (rear elevation).**



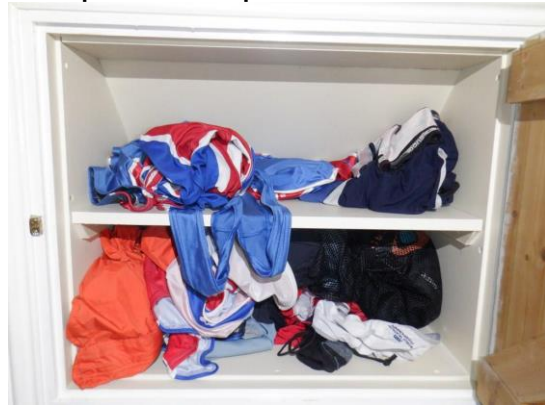
**13. Two en-suite bedrooms in loft.**



**14. Cupboard eave spaces.**



**15. Eave space insulated with hard foam.**



**16. Contained eaves cupboard.**



**17. Front gable end storage cupboard.**

N  
↑



**n.** External target note

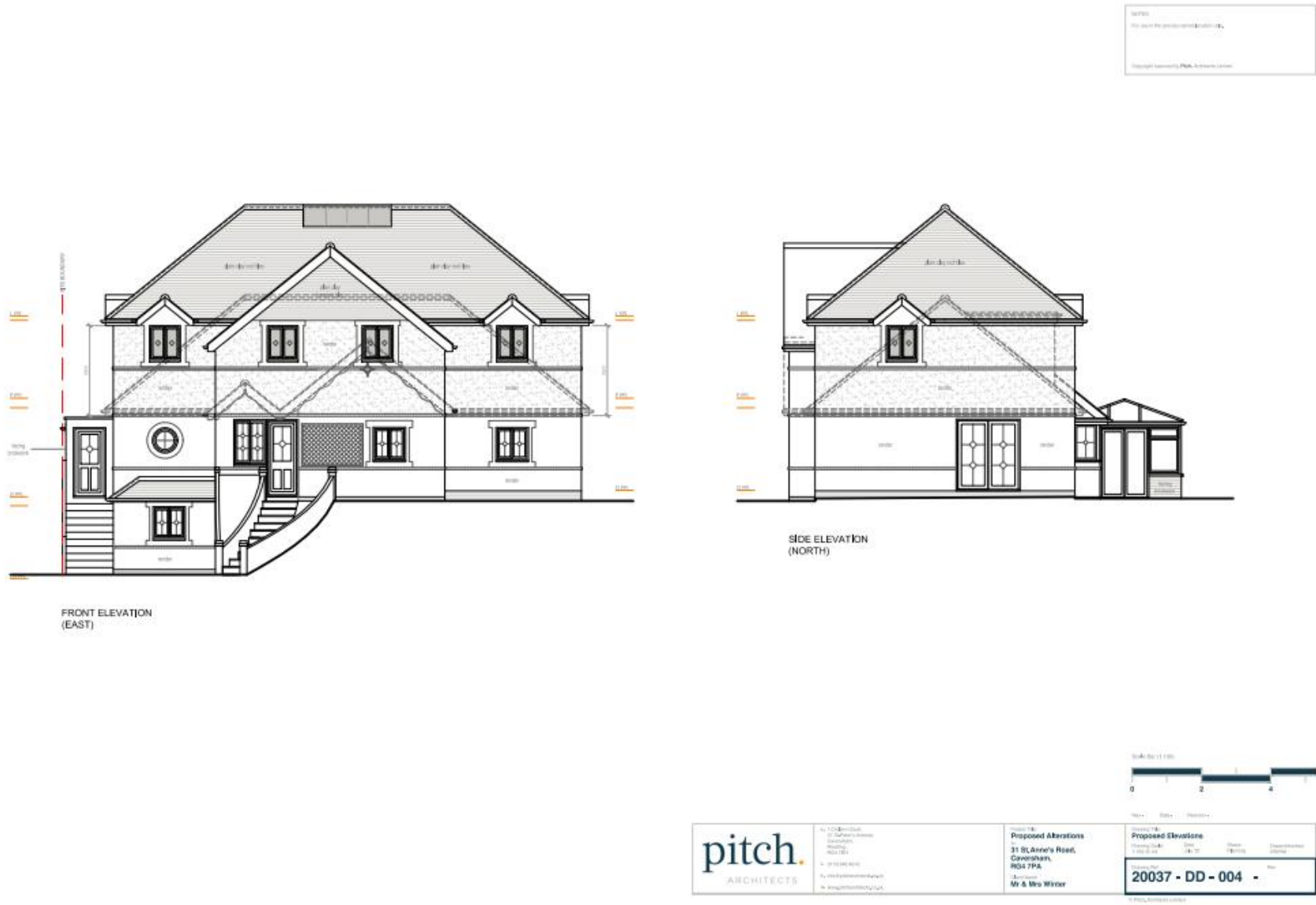
**n.** Internal target note



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- 16 -

APPENDIX 3 – PROPOSED ELEVATIONS



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|                                                                                                                                                                                                               |                                                                                                                                                          | <p>Drawing Ref:<br/><b>20037 - DD - 005</b></p> <p>Rev: 001</p> <p>© Pitch Architects Limited</p>                                                       |  |

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