

Dear Beatrice,

Thank you for your e-mail dated 7th April 2022 relating to my application at 31 Northcourt Avenue, and the comments from ecology. They consider that “the house may host roosting bats”, and so state that there is a requirement for a bat survey to confirm if this is the case. I understand that this is the case if there is a ‘reasonable likelihood’ of bats being present at the property. The following outlines why I do not believe this to be the case at the property being developed, and submit this statement in response, as per the guidance given on p.23 of the Reading Borough Council “*Validation Requirements For Planning Applications November 2021 Edition*”, referenced below:

Where proposals, including for householder applications, involve demolition of buildings or alterations to roofs or loft spaces the application will generally need to be accompanied by a bat survey report. The report will need to be based on surveys carried-out by appropriately qualified ecologists in accordance with national guidelines.

Alternatively, a statement including photos setting out why it is considered that a bat survey report is not required can be submitted – however applicants may still be asked to provide a professional bat survey in some circumstances during the assessment of the application. See here for more information: *Bats: surveys and mitigation for development projects - GOV.UK*

My first point outlines the nature of the building work, as the proposals will require minimal, if any, disturbance to the un-inhabitable roof space. The property is of the chalet bungalow style, where the majority of the ‘roof’ space is habitable space, used as current bedrooms for the house, with only a small section at the apex along the ridge being ‘vacant’ space, at just 1.2m(h) by 2.4m(w). Please see diagram.1 for a drawing of the loft space. The proposal for this application does not involve the demolition of buildings, or alterations to this loft space. Given that the guidance for bat surveys is for residential extensions that involve the demolition of buildings or alterations to roofs or lofts, I would like to reiterate that this application does not involve the demolition of buildings, or alterations to the un-inhabitable loft space. The only proposed alterations to the roof are for the installation of velux windows on one slope of the roof, and to allow for the installation of the new dormer windows to the other slope of the roof, which is part of the bedroom living space – not the vacant apex. These do not impact upon un-inhabitable loft space which may house roosting bats in the way that a loft conversion would.

Further, and following the GOV.UK advice which states that a survey is only needed if one or more of the following applies:

- ***distribution and historical records suggest bats may be present - you can search the National Biodiversity Network Atlas by species and location*** – See Diagram.8 which illustrates the bat sightings in the immediate vicinity of the property.
 - According to the above search, only the Noctule Bat has been sighted nearby, and the closest of these sightings being on the University of Reading Campus which is over 120m away. The wildlife trust website states that this variety rarely roost in buildings, which makes it unlikely that a roost would be found in our loft space. The woodland trust woodland inhabitants states that they prefer to live in the rot holes in trees as well as woodpecker holes
 - Moreover, a brief search of the other bat species indicates that only species of bat likely to roost in a large open loft space (of which our apex is not), is the brown long eared bat. There have been few confirmed sightings within the Reading area.
- ***The development site includes buildings or other built structures, underground structures or trees that provide roosting opportunities for bats***

The following points are in response to the above guidance:

- The garden at the site has no large trees, or underground structures. The property provides no opportunities for bats to access the loft space as follows:
- Unlike other properties on the street, the chimney has historically been removed from the property and covered up with tiles and so there are no openings. See diagram.2.
- All soffits and fascia are sealed with straight edge timber against straight edge brick. The do not even contain pre-cut ventilation holes which could potentially be used as access. The render to both the front and rear gable ends goes directly up to the tile edge, with no overhanging soffit or fascia to create a gap for access. The existing half dormer over the staircase has minimal side edges of whole sheet lead flashing. This is fitted to be flush to the roof tiles on the main roof slope, with no holes or gaps. Due to the small size the lead face it also appears to have a single joint/ or a repair, which has been sealed to avoid openings. To the roof of this half dormer the tiles also do not overhang the sides, and mortar fills the resulting joint. None of these 'joints' are directly attached to the main loft space, with the eaves being 4m away from the main loft, and any space between the roof rafters is considered to be insulated. See diagrams.2-6
- No gaps in tiles due to their interlocking nature. See diagram.7.
- Given the design of the existing chalet style bungalows where the majority of the upper floor rooms are habitable spaces. The un-inhabitable loft apex space of triangular shape is of approx 2.4m wide by a maximum height of 1.2m (diagram.1), which does not fit with the ideal space for bats requiring a flying area as defined by the bat conservation trust guidance below. Brown Long-eared bats like to fly around the roost in order to warm up prior to exiting.

Males will form smaller roosts elsewhere that are often cooler than the needs of the females. Generally maternity roosts should probably be between 30 and 40°C (keeping in mind that the larger the number of bats the greater the temperature gain from body heat). Also, some species have their own unique preferences and studies have shown that even a 1.5°C difference may influence bats when choosing one building over another. It is always best to provide a number of different options for bats so that they can choose the right roosts and temperature based on their needs.

for mitigation when a roost is already present. Work on existing roosts should be covered by an EPS licence.

Access, size of roost space and structure

- Crevice-dwelling bats can crawl into their roosts via small gaps in the range of 15–20mm high (h) by 20–50mm wide (w). The roost area should maintain a crevice of this approximate size that the bats can roost between. The area this roost provision covers can be small but about 1m² would be useful for summer nursery roosts. The height of entry can be from 2–7m.
- Roof-void dwelling bats require similar dimensions to access the roost but typically need timber joists or beams on which to roost. The height of entry can be from 2–7m.
- Bats needing a flying area require the same access dimension as mentioned above, 15–20mm (h) x 20–50mm (w) situated over 2m in height. The roosting area should not be trussed, to allow flight, and should ideally be about 2.8m in height and 5m in length and width.



© Helen Clark

Lesser horseshoe bat roost in garage loft

- ***The proposals include flood lighting of buildings or green space close to habitats that bats tend to use***
 - No flood lighting proposed
- ***The proposals are close to water bodies, quarries or natural cliff faces***
 - No cliff faces within the vicinity of the property. To the east is the University of Reading, approximately 120m away. On the University grounds is Whiteknights Lake, a large lake about 1km east of the house, providing extensive foraging opportunities for bats. The campus also provides a large area of woodland also providing foraging opportunities for bats. Further to the west at approximately 1.5km is the River Kennet, with thick hedgerows providing foraging opportunities for bats.

- ***It is a [wind farm proposal](#) close to a site designated for bats or close to habitats that bats use for commuting and foraging***
 - Not a wind farm proposal

In summary, I believe that the proposed work does not require a bat survey due to the nature of the property itself, location, and proposed developments not impacting on any vacant loft space.

I await a response before the deadline of 28th April 2022 as noted in the ecology request, as an extension would be required if a bat survey is still deemed to be necessary.

Kind Regards,

James Pardoe

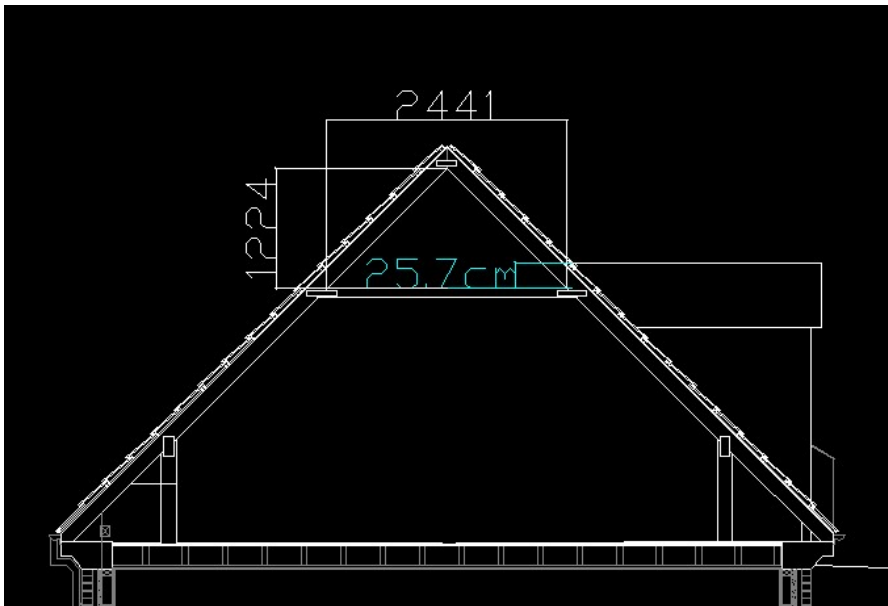


Diagram.1



Diagram.2



Diagram.3



Diagram.4



Diagram.5



Diagram.6



Diagram.7

Plecotus auritus (Linnaeus, 1758)

species Accepted Name authority: UKSI Establishment means: Native

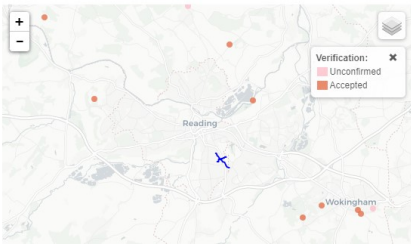
JSON

Overview Gallery Names Classification Records Literature Sequences Data Partners



29,560 records (29,567 in total)

This map contains both point- and grid-based occurrences at different resolutions



Myotis daubentonii (Kuhl, 1817)

species Accepted Name authority: UKSI Establishment means: Native

JSON

Overview Gallery Names Classification Records Literature Sequences Data Partners

Biology

Bats are the only true flying mammals. In Britain they are insectivorous (eat insects), and contrary to popular misconception they are not blind; many can actually see very well (6). All British bats use echolocation to orient themselves at night; they emit bursts of sound that are of such high frequencies they are beyond the human range of hearing and are called 'ultrasound' (7). They then listen to and interpret the echoes bounced back from objects, including prey, around them, allowing them to build up a 'sound-picture' of their surroundings (7). Daubenton's bats produce echolocation calls of frequencies between 35 and 85 kHz, but most calls peak at 45-50 kHz (5). They emerge at twilight, and with fast, agile flight they hunt over water, close to the surface (2), taking small flies, midges, mayflies (5) and moths (2). They have been seen taking prey from the surface of the water using the tail membrane or the feet (5), eating the prey whilst flying (2). Mating tends to occur in autumn (5), but fertilisation is delayed until the following spring (7).

28,393 records (28,395 in total)

This map contains both point- and grid-based occurrences at different resolutions



Myotis nattereri (Kuhl, 1817)

JSON

Natterer's Bat

species Accepted Name authority: UKSI Establishment means: Native

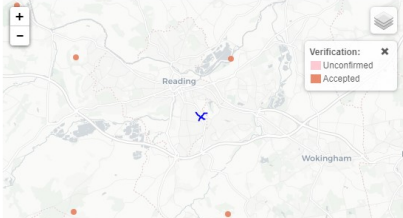
OverviewGalleryNamesClassificationRecordsLiteratureSequencesData Partners



Supplied by: Malcolm Storey/Anon

18,056 records (18,058 in total)

This map contains both point- and grid-based occurrences at different resolutions



Nyctalus noctula (Schreber, 1774)

JSON

Noctule Bat

species Accepted Name authority: UKSI Establishment means: Native

OverviewGalleryNamesClassificationRecordsLiteratureSequencesData Partners

Lifespan, longevity, and ageing

Maximum longevity: 12 years (wild) Observations: In captivity, three month-old females may mate, but in the wild males are not known to mate until about 15 months-old and females probably only mate when they are one year of age.

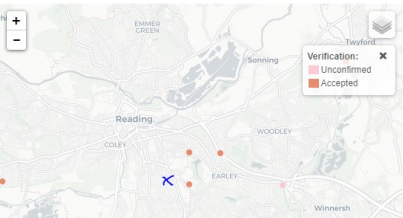
Rights holder: Joao Pedro de Magalhaes
Provided by: Encyclopedia of Life

Online Resources

- JSON
- GBIF
- Biodiversity Heritage Library
- PESI

18,369 records (18,370 in total)

This map contains both point- and grid-based occurrences at different resolutions



Vespertilio murinus Linnaeus, 1758

JSON

Parti-coloured Bat

species Accepted Name authority: UKSI Establishment means: Non-native

OverviewGalleryNamesClassificationRecordsLiteratureSequencesData Partners

Lifespan, longevity, and ageing

Maximum longevity: 12 years Observations: Given the longevity of similar species, the maximum longevity in these animals appears underestimated.

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Provided by: Encyclopedia of Life

Online Resources

- JSON
- GBIF
- Encyclopaedia of Life
- Biodiversity Heritage Library
- PESI

14 records (14 in total)

This map contains both point- and grid-based occurrences at different resolutions

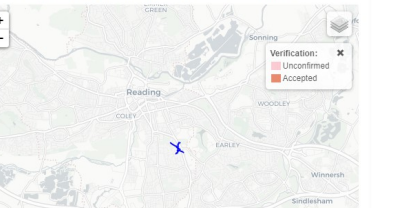


Diagram.8