



R Collard Ltd

124 CARDIFF ROAD

Preliminary Bat Roost Assessment Report





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R Collard Ltd

124 CARDIFF ROAD

Preliminary Bat Roost Assessment Report

WSP

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Basing View

Basingstoke, Hampshire

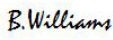
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EXECUTIVE SUMMARY

- 1.1.1. R Collard Ltd (the client) wishes to submit a planning application for the demolition of an existing building and construction of a new building associated with the development of the Reading Waste Transfer Site (WTS) (the “Scheme”). The planning application will include the demolition of one building within a ‘Site’ located on Trafford Road, adjacent to the Scheme.
- 1.1.2. The Site is located at No.124 Cardiff Road (GR SU 70518 74149), to the northwest of Reading. The Site is bound to the north and west by existing Reading WTS buildings and facilities. The eastern boundary comprises a UPS warehouse whilst it is bounded to the south by Cardiff Road.
- 1.1.3. WSP was commissioned to undertake a Preliminary Bat Roost Assessment (PBRA) of one building within the Site, Building 1. Building 1 was inspected to enable an assessment of their suitability to support bat roosts, and to search for evidence indicating the current or historic use of the building by roosting bats.
- 1.1.4. Building 1 was found to have potential roost features suitable to support summer or transitional bat roosts. Given the features present and the surrounding urban environment, Building 1 is considered to be of low suitability to support roosting bats.
- 1.1.5. In line with good practice guidance, it is therefore recommended that one further dusk emergence/dawn re-entry survey is undertaken to identify the presence or likely absence of bat roosts. One emergence or one re-entry survey should be completed between May and August inclusively in suitable weather conditions (sunset temperature 10°C or above, no rain, no strong wind).
- 1.1.6. Should bat roosts be identified during dusk emergence/dawn re-entry survey, further roost characterisation surveys will be required to inform the application of a European Protected Species Mitigation (EPSM) licence. At this stage the requirement of an EPSM is unknown, however this report outlines the likely requirements of an EPSM and associated mitigation strategy for information.
- 1.1.7. In line with national and local planning policy, ecological recommendations have been given within this report, including the incorporation of bat boxes to increase local biodiversity.

1. INTRODUCTION

1.1. PROJECT BACKGROUND

- 1.1.1. R Collard Ltd (the client) wishes to submit a planning application for the demolition of an existing building and construction of a new building and a bespoke Environmental Permit application for submission to the Environment Agency. These works will be undertaken as part of the development of the Reading Waste Transfer Site (WTS) (the 'Scheme'). The planning application referred to within this report is for a 'Site' located on Trafford Road, adjacent to the Scheme, see Figure 1. WSP is supporting the client pre-application, planning application preparation, and post submission management to inform the Scheme.
- 1.1.2. The Site is located at No.124 Cardiff Road (GR SU 70518 74149), close to the junction of Trafford Road and Cardiff Road, to the northwest of Reading. An existing building is located within the Site footprint. The Site is bound to the north and west by existing Reading WTS buildings and facilities. The eastern boundary comprises a UPS warehouse whilst it is bounded to the south by Cardiff Road.

1.2. ECOLOGICAL BACKGROUND

- 1.2.1. A Pre-Application Enquiry was sent to Reading Borough Council (RBC). The response to the enquiry from RBC identified the potential of the existing building on Site to support roosting bats, due the age of the building and the Site's proximity to habitat of good suitability for use by foraging and commuting bats. See Figure 2 for an aerial image of land use around the Site. Further survey to confirm and categorise this suitability was recommended.
- 1.2.2. The Site is located in an industrial business park, with the local area being predominately urban in nature. Approximately 0.2km to the northwest of the Site are a series of grassland fields, located within an area of land which hosts a large annual music festival. Given the use of the fields, they are likely to be semi-improved and species poor. The fields and associated access roads are lined with a series of scattered trees and hedgerows, which are considered suitable to support foraging and commuting bats. A railway corridor is located immediately south of the Site, which is also considered likely to provide some connectivity between foraging sites and a commuting route for bats.
- 1.2.3. The Site does not lie within any ecological conservation area and is not adjacent to any designated ecological sites. No preceding ecological surveys have been undertaken at the Site.
- 1.2.4. Out of the 18 species of bat recorded in the UK, 14 have been recorded in Berkshire and South Buckinghamshire (Andrews, 2013). A total of 12 granted European protected species applications were returned from Defra's Magic Map Application¹ within 2km of the Site. Licenced bat roosts recorded include common pipistrelle *Pipistrellus pipistrellus* and soprano pipistrelle *Pipistrellus pygmaeus*, Daubenton's bat *Myotis daubentonii* and brown long eared bat *Plecotus auritus*.

¹ Defra Magic Application. Available at <https://magic.defra.gov.uk/magicmap.aspx>. Granted European Protected Species Applications (England).

1.3. BRIEF AND OBJECTIVES

- 1.3.1. The client commissioned WSP UK Ltd to complete a Preliminary Bat Roost Assessment (PBRA) of the Site. The brief was to:
- § Complete an external inspection of the building (Building 1) on Site, and internal inspection where possible, to identify the potential or otherwise for bat roosts to be present; and
 - § Make recommendations as to how the Scheme should account for bats with respect to legislation, planning and biodiversity policy.
- 1.3.2. The results of these surveys, and subsequent recommendations, are included within this report.

2. METHODS

2.1. PRELIMINARY BAT ROOST ASSESSMENT

- 2.1.1. The single building present was inspected to enable an assessment of their suitability to support bat roosts, and to search for evidence indicating the current or historic use of the building by roosting bats.
- 2.1.2. A visual inspection of the exterior of the building using binoculars and a high-powered torch was completed to search for features which may provide potential roosting opportunities for bats (Potential Roost Features, PRFs). Where PRFs were noted, their location and a brief description of their character was recorded. Additionally, each PRF was visually inspected for evidence indicating use by roosting bats such as droppings, urine staining, and scratch marks / characteristic staining (from fur oils). An internal inspection of the warehouse was completed to search for similar features and evidence inside buildings.
- 2.1.3. The building was categorised in line with the descriptions in Table 1. Based on the features present and the location of the building, the suitability for different types of bat roost was also considered. The suitability of the building to support bats was categorised into a roost type following good practice guidance (Collins 2016). Roost types include:
- § Maternity (breeding roost);
 - § Summer / transitional (to include transitional, satellite, night and day roosts); and
 - § Hibernation.

Table 1 – Roost Suitability Categorisation (Collins 2016, Table 4.1)

Suitability	Description
Confirmed	Building with features confirmed to be used by roosting bats either by historic records (verified appropriately), or evidence recorded during survey.
High	Building with highly suitable features capable of supporting larger roosts, and/or multiple roost locations on a regular basis. Generally, these buildings are located in proximity to highly suitable foraging/commuting habitat such that the presence of a roost is considered highly probable.
Moderate	Building exhibiting one or more suitable features able to support larger roosts, or multiple features with the potential to be used by individual/small numbers of bats (but is unlikely to support a roost of high conservation status). Surrounding area includes good quality foraging habitat for bats e.g. broadleaved woodland, tree-lined watercourses and grazed parkland such that the presence of a roost is considered probable.
Low	Building with single, or few features capable of supporting individual/small numbers of bats e.g. external roosting features such as fascia or soffit boards, in which bats are considered less likely to be present. Or, a greater number or variety of features located in sub-optimal habitat such that bats would be less likely to use it e.g. isolated from foraging or commuting habitats.
Negligible	Building with no potentially suitable opportunities for roosting bats, or very few or minor features in an isolated/unsuitable location such that the presence of a roost is considered highly improbable. e.g. isolated from suitable foraging or commuting habitats.

2.2. DATES OF SURVEY AND PERSONNEL

- 2.2.1. The PBRA was completed on 3 June 2020 by an experienced surveyor (Natural England Bats: survey or research licence (level 2) (CL18) number 2019-390480-CLS-CLS). The lead surveyor has five years' experience of ecological survey, including extensive bat survey experience and has held a CL18 bat survey licence since 2019.

2.3. NOTES AND LIMITATIONS

- 2.3.1. There was no external view of the northern aspect of Building 1 due to access constraints and lack of visibility due to adjacent buildings. There was also no external view of the eastern aspect of the pitched roof due to a lack of visibility. Whilst these aspects were not visible externally, they were inspected internally. The roof is made from corrugated sheet metal and therefore is not considered to have suitable roosting features itself. Whilst a lack of visibility of the north aspect is not considered a significant limitation to the results of the assessment, it is advised that for recommended further survey (see Section 5), one surveyor should be placed with a view of the north aspect of the building.
- 2.3.2. The false ceiling/loft space could not be assessed within Building 1 due to unsafe access. This is however not considered a limitation to the assessment given the loft space is comprised of corrugated roof sheeting and a steel frame. It is therefore considered that the loft space will not remain at a stable temperature and is therefore unlikely to be suitable in supporting roosting bats.
- 2.3.3. The two PRFs identified within Building 1 were too high to assess with a ladder, torch nor endoscope. Further survey will be required to confirm the presence or likely absence of bats (see Section 5 for further detail).

3. RESULTS

3.1. PRELIMINARY BAT ROOST ASSESSMENT

- 3.1.1. One building is present on Site, Building 1. Building 1 is a disused single storey warehouse and office facility. The building is estimated to be 40 years old. The warehouse has a pitched roof constructed with corrugated panels. A false ceiling/loft space is present above the office space. Photographs of the building are given in Appendix A (Photographs 1 – 6).
- 3.1.2. Two suitable roosting features were located during the internal assessment of Building 1. No external features were identified considered suitable to support roosting bats, however multiple access and egress points were identified on the exterior of the building which provide connectivity to the internal features.
- 3.1.3. The two internal features are gaps in brickwork which may lead to cavity spaces within internal brick walls. The features are at a height of approximately 3-4m from the ground.
- 3.1.4. Building 1 has potential roost features suitable to support summer or transitional bat roosts. Given the features present and the surrounding urban environment, Building 1 is considered to be of low suitability to support roosting bats. Building 1 is considered unlikely to support maternity nor hibernation roosts given the likely temperature fluctuation that occurs within the building.
- 3.1.5. Further detail is included in Table 2 below and shown on Figure 3. Photographs of the features and access/egress points are given in Appendix A.

Table 2 – Building 1 Inspection Results

Feature No. as shown on Figure 3	Photograph Number (Appendix A)	Description ²	Location of Features		Evidence of roosting bats recorded?	Overall Assessment of Suitability to Support Bat Roosts	Suitability for different roost types ³		
			External	Internal			M	S	H
1	7	Brickwork access/egress point– three gaps within the brickwork providing internal access into the warehouse.	Y	-	N	-	-	-	-
2	7	Roof access/egress point – gaps between the corrugated roof and wall providing internal access into the warehouse.	Y	-	N	-	-	-	-
3	8 & 9	Doorway access/egress point – gap above sliding door providing internal access into the warehouse.	Y	-	N	-	-	-	-
4	8 & 9	Roof access/egress point – gaps between the corrugated roof and wall providing internal access into the warehouse.	Y	-	N	-	-	-	-
5	10	Vent access/egress point – open metal vent in roof providing internal access into the warehouse.	Y	-	N	-	-	-	-

² Access/Egress points are not themselves considered suitable to support roosting bats, however provide connectivity to PRFs. Access/Egress points have therefore been included to aid the building description.

³ M = Maternity (breeding roost); S = Summer / transitional (to include transitional, satellite, night and day roosts); and H = Hibernation.

Feature No. as shown on Figure 3	Photograph Number (Appendix A)	Description ²	Location of Features		Evidence of roosting bats recorded?	Overall Assessment of Suitability to Support Bat Roosts	Suitability for different roost types ³		
			External	Internal			M	S	H
6	11	PRF 1 – three gaps in the internal brick wall within warehouse. These may extend into a cavity wall. These are approximately 3-4m above ground level.	-	Y	N	Low	-	Y	-
7	12	Pipe access/egress point – open pipe providing internal access into the segregated warehouse.	Y	-	N	-	-	-	-
8	13	PRF 2 – three gaps in the internal brick wall within the segregated warehouse. These may extend into a cavity wall. These are approximately 3-4m above ground level.	-	Y	N	Low	-	Y	-

4. IMPLICATIONS FOR DEVELOPMENT

4.1. LEGAL COMPLIANCE

- 4.1.1. Building 1 has potential roost features suitable to support summer or transitional bat roosts and is therefore of low suitability to support roosting bats. The following legislation and planning policy is therefore relevant to the Site. Recommendations as to how the legislation and planning policy requirements may be satisfied are set out in Section 5.
- 4.1.2. Bats and their roosts are afforded a high level of protection under the Conservation of Habitats and Species Regulations 2017 (as amended) (the 'Habitats Regulations'), the legislation means that it is an offence to:
- § *Deliberately capture, injure or kill a wild bat;*
 - § *Deliberately disturb wild bats; 'disturbance of animals includes in particular any disturbance which is likely:*
 - (a) to impair their ability —*
 - (i) to survive, to breed or reproduce, or to rear or nurture their young; or*
 - (ii) in the case of animals of a hibernating or migratory species, to hibernate or migrate; or*
 - (b) to affect significantly the local distribution or abundance of the species to which they belong.'*
 - § *and*
 - § *Damage or destroy a breeding site or resting place used by this species.*
- 4.1.3. Protection is also afforded under the Wildlife and Countryside Act 1981 (as amended) with respect to disturbance of animals when using places of shelter, and obstruction of access to places of shelter.
- 4.1.4. Due to the high level of protection afforded to bats and their habitat, mitigation for this species is governed by a strict licensing procedure administered by Natural England (normally, planning permission must be obtained before a licence can be sought). Licencing is subject to three tests, as defined under the Habitats Regulations 2017 (as amended) Regulation 55, these must also be applied by the planning authority before granting permission for activities affecting bats. For permission to be granted the following criteria must be satisfied:
- § *The proposal is necessary for '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';*
 - § *'There is no satisfactory alternative'; and*
 - § *The proposals 'will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range'.*
- 4.1.5. Certain species of bats including the noctule bat *Nyctalus noctula*, brown long-eared bat and soprano pipistrelle are also listed as a Species of Principal Importance (SPI) for the Conservation of Biodiversity in accordance with Section 41 of the NERC Act 2006 (England). Under Section 40 of the NERC Act (England) public bodies (including local planning authorities) have a duty to have regard for the conservation of SPI when carrying out their functions, including determining planning applications.

4.2. PLANNING POLICY COMPLIANCE

- 4.2.1. At the national level the National Planning Policy Framework (2019) forms the basis for planning system decisions with respect to conserving and enhancing the natural environment, including bats; the ODPM circular 06/2005 also provides supplementary guidance, including confirmation that ‘the presence of a protected species is a material consideration when a planning authority is considering a development proposal’.
- 4.2.2. The NPPF sets out, amongst other points, how at an overview level the ‘*planning system should contribute to and enhance the national and local environment by:*
- § *...recognising... the wider benefits of natural capital and ecosystem services; and*
 - § *minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures...*
- 4.2.3. A list of principles which local planning authorities should follow when determining planning applications is included in the NPPF, and includes the following:
- § *‘- if significant harm resulting from a development cannot be avoided...adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
 - § *- ...opportunities to incorporate biodiversity in and around developments should be encouraged;*
 - § *- development resulting in the loss or deterioration of irreplaceable habitats should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.’*
- 4.2.4. At a local level Policy EN12: Biodiversity and The Green Network of the Reading Local Plan 2019 (RBC 2019) states that:
- “...All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map (Green Network Map). b) On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible.*
- Development should:*
- *Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*
 - *Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.”*
- 4.2.5. Certain species of bats are also priority species in both the UK Biodiversity Action Plan (UKBAP). At a local level, the Reading BAP lists pipistrelle species *Pipistrellus* spp. (common and soprano), noctule, Daubenton’s bat, serotine bat *Eptesicus serotinus*, brown long eared bat and Natterer’s bat *Myotis nattereri*.
- 4.2.6. Mitigation, compensation and enhancement measures are recommended in Section 5 to enable the Scheme to be compliant with the above legislation and planning policy.

5. RECOMMENDATIONS

5.1. FURTHER SURVEY

- 5.1.1. Building 1 has a low suitability to support roosting bats. It is therefore recommended that following good practice guidelines (Collins 2016), further dusk emergence/dawn re-entry survey is undertaken to identify the presence or likely absence of bat roosts.
- 5.1.2. Following good practice guidance, one survey visit is required. This is to comprise one emergence or one re-entry survey to be completed between May and August inclusively in suitable weather conditions (sunset temperature 10°C or above, no rain, no strong wind).
- 5.1.3. It is anticipated that three surveyors will be required to undertake further survey, in order to view all aspects of the building. The north aspect was not visible during the PBRA due to access and limited visibility. It is recommended that during further survey, one surveyor should be placed with a view of the north aspect of the building.
- 5.1.4. Should evidence of roosting bats be identified during the survey, further roost classification surveys will be required. These will likely require further dusk emergence/dawn re-entry surveys or at height inspections.

5.2. AVOIDANCE AND MITIGATION MEASURES

BAT ROOSTS

- 5.2.1. Further survey is required to determine the presence or likely absence of bat roosts within Building 1 as discussed in Section 5.1. The information below is provided as an indication of what may be required, should a bat roost be confirmed within Building 1 during subsequent survey works. Should no bats be found to be roosting within Building 1, then demolition can take place without any further constraints relating to bats for the period that survey findings remain valid.
- 5.2.2. Given Building 1 will be demolished to allow the development of the Site, it will not be possible to retain features used by roosting bats (should they be identified in subsequent survey). It will therefore be necessary to mitigate potential negative effects that would otherwise result from the removal of features and provide replacement roosting opportunities.
- 5.2.3. When determining a planning application in relation to a proposal that will affect bats and/or their roosts the local planning authority must ensure that they are satisfied that three tests, as set out in Regulation 55 of the Habitats Regulations 2017 (as amended), are likely to be met (see Section 4). To satisfy the third test, if roosts will be directly affected by works a mitigation strategy should be prepared, based on recommendations within this report, showing that it will be feasible to progress the development and maintain the favourable conservation status of bat species identified on Site. Once planning permission has been obtained, this strategy may then be refined and form the basis of a licence application to Natural England (European Protected Species Mitigation (EPSM) licence) to permit the commencement of works affecting known bat roosts.
- 5.2.4. It is recommended that, should the mitigation strategy be required, it should include the following key components:
 - § Provision of alternative roosting opportunities that will replace those lost to the development of the Site. If this requirement is fulfilled by the placement of bat boxes they should be installed in

positions where they are out of reach of people from the ground (so as to limit interference) and high enough to deter cats and other predators (without being placed too high as this makes maintenance more difficult and can leave the boxes exposed to weather, particularly strong winds). In practice, placing them between 3 and 4.5 metres from the ground is optimal. Boxes should be placed in a range of locations at slightly different heights and facing in slightly different directions to give a choice of roost site options (Mitchell-Jones, 2004). The direction of the boxes should be selected to avoid facing them into the prevailing weather and will preferably be positioned facing in a southerly direction (i.e. south-west through south to south-east) where they will receive a good degree of sunlight.

- § In addition to the boxes, where feasible, bat tubes (Schwegler 1FR and 2FR) or alternative integrated features could also be installed within a proportion of the new buildings.
- § Precautionary methods for removal of existing roost structures (including seasonal timings and suitable methods of work); and
- § A mechanism for future maintenance and monitoring of replacement roosts.

SENSITIVE LIGHTING

- 5.2.5. Lighting both during the construction phase and operational phase of the Scheme could have a negative effect upon bat activity on Site and the immediate surrounding area.
- 5.2.6. It is recommended that the lighting strategy for the Site seeks to:
 - § Use the minimum light levels necessary for the relevant task / function, this may equate to reducing light intensity, and/or using the minimum number or light sources or minimum column height;
 - § Use hoods, louvres or other luminaire design features to avoid light spill onto retained and newly created areas of vegetation likely to be used by foraging and commuting bats;
 - § Use narrow spectrum light sources where possible to lower the range of species affected by lighting, specifically avoiding shorter wavelength blue light, using instead warm/neutral colour temperature <4,200 kelvin lighting (BCT, 2014b); and
 - § Use light sources that emit minimal ultra-violet light to avoid attracting night-flying invertebrate species which in turn may attract bats to the light.
- 5.2.7. Where possible, consideration should also be given to varying the lighting levels during operation. For example, it may be possible to reduce lighting levels or perhaps even switch installations off after certain times e.g. between 00:00 and sunrise. This use of “adaptive lighting” can tailor the installation to suit human health and safety as well as wildlife needs (BCT, 2014b).

5.3. ECOLOGICAL ENHANCEMENT MEASURES

- 5.3.1. Planning policy promotes the inclusion of ecological enhancement. In line with national and local planning policy it is therefore recommended that consideration is given to the following enhancement measures:
 - § Installation of bat bricks or bat tubes (above those required for mitigation and compensation of the known roosts) into the fabric of any new buildings to increase the roosting opportunities on Site for bats.

6. CONCLUSIONS

- 6.1.1. The PBRA identified internal PRFs within Building 1 that may lead to a cavity space suitable to support roosting bats. No external PRFs were identified however features were identified that allow for bats to access the internal PRFs. Building 1 is considered to be of low suitability to support roosting bats.
- 6.1.2. In accordance with good practice guidelines, one further dusk emergence or dawn re-entry survey is required to confirm the presence or absence of roosting bats in Building 1. Relevant legislation and policy regarding bats and their roosts has been outlined within this report.
- 6.1.3. Should further survey identify a bat roost within Building 1, an EPSM licence and associated mitigation strategy will be required. This report provides an outline of the requirements for the EPSM licencing process. In accordance with national and local policy, ecological enhancements including provision of bat boxes is also discussed.

7. REFERENCES

7.1. TECHNICAL REFERENCES

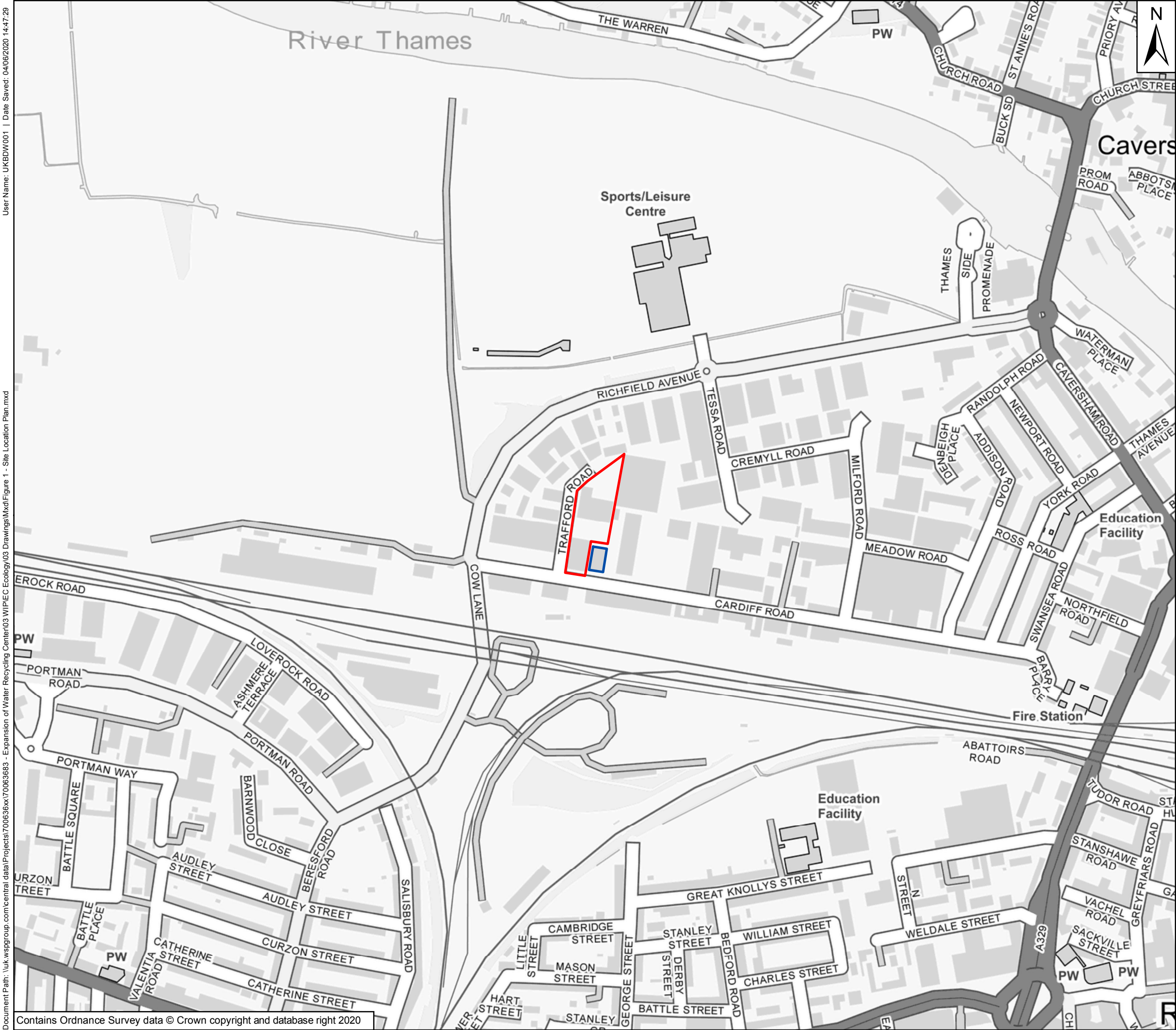
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8. FIGURES

Figure 1 – Site Location Plan

Figure 2 – Site Location Plan - Aerial

Figure 3 – Preliminary Bat Roost Assessment Results



N

0

0.075

0.15

0.225

0.3

km

Key

Reading Waste Transfer Site

124 Cardiff Road

Client:

R Collard Ltd.

Project:

Reading Waste Transfer Site -
124 Cardiff Road

Title

Site Location Plan

Drawing No:

Figure 1

Date:

04/06/2020

Scale:

5,000 @ A3

Drawn:

BW

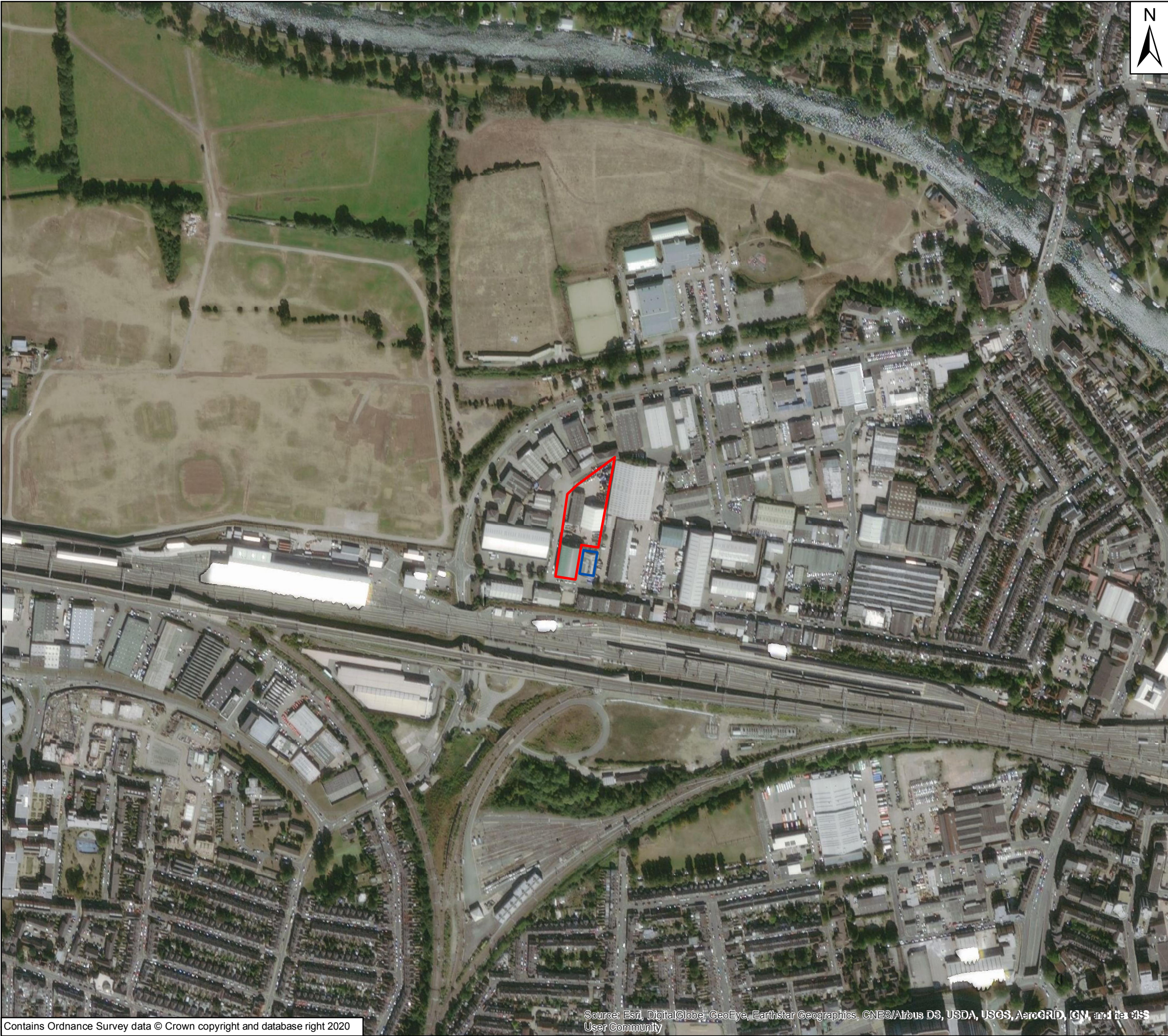
Checked:

RP

Approved:

OP

Contains Ordnance Survey data © Crown copyright and database right 2020



N

Key

Reading Waste Transfer Site

124 Cardiff Road

00.0750.150.2250.3

km

wsp

Client:

R Collard Ltd.

Project:

Reading Waste Transfer Site -
124 Cardiff Road

Title

Site Location Plan - Aerial

Drawing No: Figure 2

Date: 17/06/2020

Scale: 5,000 @ A3

Drawn: BW

Checked: RP

Approved: OP



N

Key

Reading Waste Transfer Site

124 Cardiff Road

Bat Suitability

Low

PRF/Access Point

PRF - Internal Brick Cavity

Brickwork Access/Egress

Door Access/Egress

Pipe Access/Egress

Roof Access/Egress

Vent Access/Egress

00.0000.00020.00040.00060.0008

km

wsp

Client:

R Collard Ltd.

Project:

Reading Waste Transfer Site -
124 Cardiff Road

Title

Preliminary Bat Roost Assessment

Drawing No:

Figure 3

Date:

04/06/2020

Scale:

150 @ A3

Drawn:

BW

Checked:

RP

Approved:

OP

Contains Ordnance Survey data © Crown copyright and database right 2020

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Appendix A

PHOTOGRAPHS

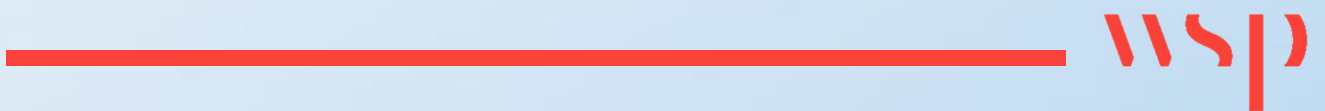


Table A-1 – PBRA Photographs

			
1 - Southern aspect of the Site	2 - Eastern aspect of the Site	3 - Western aspect of the Site	4 - Large warehouse space
			
5 - Office space with false ceiling	6 - Small segregated warehouse	7 - Access points in brickwork (Feature 1 and 2)	8 - Access points in doorways and roof (Feature 3 and 4) from the building external



9 - Access points in doorways and roof (Feature 3 and 4) from the building internal



10 - Access point from vent (Feature 5)



11 - PRF 1- gaps in the brickwork leading to cavity space.



12 - Access point via wall pipe (Feature 7)



13 - PRF 2 gaps in the brickwork leading to cavity space.



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