

Urban Tree Experts

BS5837 – Tree Surveys – Ecological Consulting

PRELIMINARY ECOLOGICAL APPRAISAL (BATS) AT 34, 36 AND 36A MILL ROAD CAVERSHAM



**Prepared for:
Mr E Jennings
34, 36 and 36A Mill Road
Caversham
Reading
RG4 8DP**

28 August 2020

Ref: SPH/ET/PEA-20/19.08



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The validity of this report ceases at the prescribed time limit or after 12 months from the site inspection, or if the site conditions change due to unspecified works that affect the site whichever is the sooner.



Executive Summary

Urban Tree Experts was commissioned by Mr E Jennings to conduct a preliminary ecological appraisal (bats) of 34, 36 & 36A Mill Road, Caversham, Reading, RG4 8DP. This is to support a forthcoming planning application to Reading Borough Council.

The site visit was carried out on Wednesday 19 August 2020 at 10.30hrs, during daylight hours. An internal and external inspection of the properties took place, to look for signs of bats.

The preliminary ecological appraisal (bats) comprised a detailed search of the interior and exterior of the buildings for bats, signs of bats and features suitable for use by roosting bats. This includes droppings, internally or externally, scratch marks, rubbing and staining at exit holes, live or dead bats and other features such as missing tiles, this list is not exhaustive.

The desk top study revealed that two current European Protected Species Licences (EPSL's) for bats have been granted within 2km of the proposed development site.

Externally, there was no evidence of bats (current or historically) within the properties or attached garage at 34 Mill Road. The buildings are in a fair condition externally and internally and there were no visible roosting opportunities or access points into the buildings which could be utilised by bats.

Due to the absence of roosting potential and the lack of evidence of bats found during the detailed inspection, it is concluded that there is negligible potential for roosting bats to be present within the properties or attached garage. Based on the recommendations in the Bat Workers Manual and the Bat Surveys Good Practice Guidelines prior to works, no further surveys are required, and the proposed future works should proceed.



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1. Introduction

1.1 Instruction

Urban Tree Experts was instructed by Mr E Jennings to conduct a preliminary ecological appraisal of 34, 36 and 36A Mill Road, Caversham, Reading, RG4 8DP to support a forthcoming planning application to Reading Borough Council.

1.2 Aims and Objectives

The preliminary ecological appraisal (bats) is designed to:

- Identify the presence/likely absence of bats within the buildings.
- Provide information on the status of bats using the buildings (currently or previously).
- To add confidence where no bats are found, or to categorise the nature of a roost where evidence of bats are found.
- To establish whether further surveys, mitigation or an EPSL is required.

The preliminary ecological appraisal (bats) and report writing were carried out in accordance with Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition, Bat Conservation Trust, 2016).

1.3 Proposed Works

The survey was commissioned in connection with a recently refused planning application by Reading Borough Council (ref: 200582). The proposal was for a two-storey side and single storey front extension at 34 and 36A Mill Road, a two-storey rear extension at 34 and 36 Mill Road, a single storey rear extension at 34 Mill Road and loft conversions with flat roof dormers at 34, 36 and 36A Mill Road. The proposed development was refused for a number of reasons, one of which was the absence of a bat survey.

1.4 Surveyor Background and Experience

The preliminary ecological appraisal for bats was completed by Emma Turnbull and the report was written by Simon Holmes CEnv. Emma holds a Class 2 Bat Licence (CLS-41628) and has been surveying bats for three years. She has received training in surveying techniques, bat detector use, echolocation analysis and bat biology and identification. Simon holds Class 3 (CL19) and 4 Bat (CL20) Licenses (Nos. 17637 and 17638) and a Science and Education license (SCI29096). He has 31 years' experience of carrying out bat surveys and bat conservation work.

2. Legislation and Planning Policy

2.1 Legislative Background

All species of British bat are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as amended. Under this legislation it is an offence to kill or injure a bat or interfere with any roosting or resting site. A bat roost is interpreted as "*any structure or place used for shelter or protection*" whether or not bats are present at the time. A summary of the main legislation and planning considerations are included at Appendix 1.

Seven species of bat are also Species of Principal Importance for nature conservation in England under Section 41 of the Natural Environment and Rural Communities Act 2006. This places a duty on all government departments to have regard for the conservation of these species and on the Secretary of State to further, or promote others to further, the conservation of these species.



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3. Site Location and Description

3.1 Site Location

The building is located at Grid Reference SU 7224 7440, see Figure 1 below. An overview of the immediate area is shown on Figure 2, courtesy of Bing Maps.

Figure 1. 34, 36 and 36A Mill Road, Caversham, highlighted.

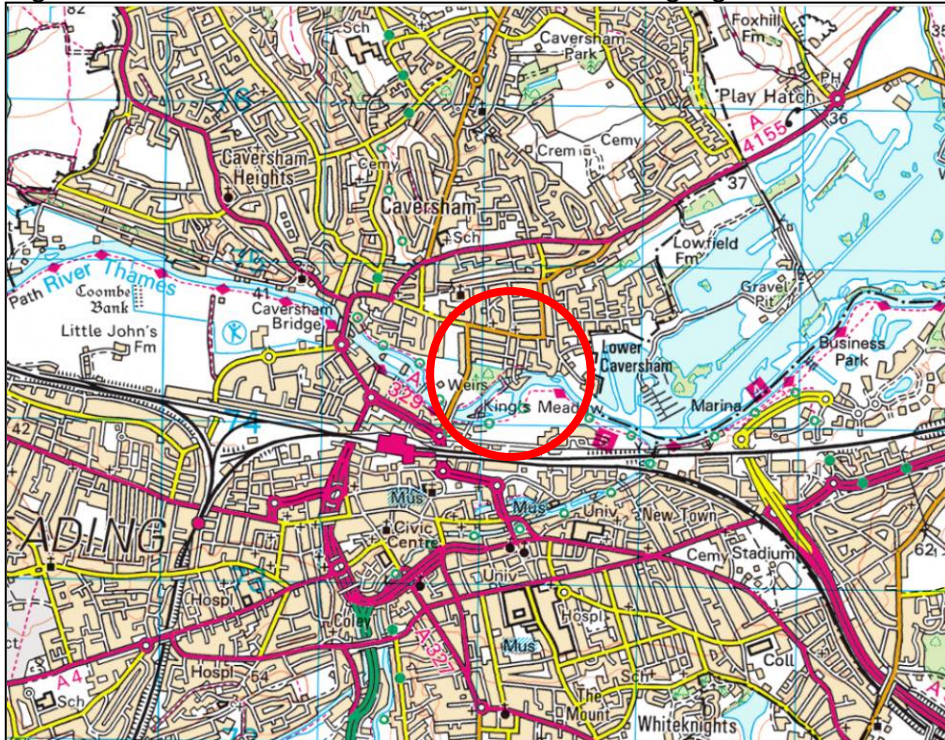
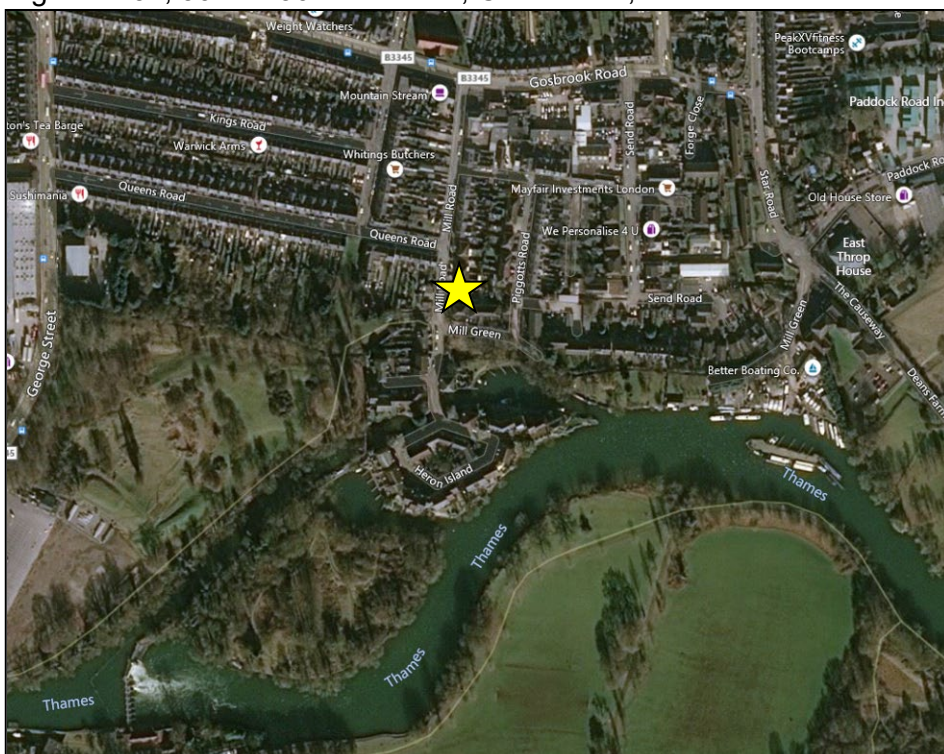


Figure 2. 34, 36 and 36A Mill Road, Caversham, overview of the immediate area.





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3.2 Site Description

The application site comprises three terraced houses. All the houses have concrete driveways to the front and nothing by way of a front garden. 34 Mill Road also has a detached garage and a rear garden, the majority of which is laid to lawn, with some small shrubs, see Figure 3 below. 36 Mill Road also has a rear garden, that is very overgrown, see Figure 4 on page 7. There is also a rear garden at 36A Mill Road, which is laid to lawn and patio, with some non-native shrub species around the boundaries, see Figure 5 on page 7. The sites offer limited foraging and commuting habitat for bats.

Figure 3. Rear garden. 34 Mill Road, Caversham. 19.08.20





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Figure 4. Overgrown rear garden. 36 Mill Road, Caversham. 19.08.20



Figure 5. Rear garden. 36A Mill Road, Caversham. 19.08.20





4. Survey Methodology

4.1 Pre-Survey Data Search

Google Earth and MAGIC maps (magic.defra.gov.uk) websites were used prior to the survey to determine the suitability of the surrounding habitat to support roosting bats and to identify any statutory designated sites within 2km of the site.

The site is situated in a suburban area of Reading, in the town of Caversham, and is surrounded by properties and gardens of differing sizes and styles. Immediately to the south lies the River Thames, which provides good habitat for bats and is within travelling distance for bats. To the west lies Christchurch Meadows and to the east the Thames and Kennet Marina, both of which provide good roosting, commuting and foraging habitat for bats and have some ecological connectivity to the site. Further afield lie areas of farmland, woodland and large waterbodies, and although they are likely to provide good habitat to support roosting bats, there is limited ecological connectivity from the site to these areas.

There are no designated sites within 2km of the proposed development site. A search of the Magic interactive website revealed two current EPSLs for bats have been granted within 2km of the site, the details of which are provided in Table 1 below.

Table 1. Current EPSLs for bats within 2km of the site

EPSL reference	Licence end date	Species on licence
2017-28045-EPS-MIT	2022	Daubentons
2016-22301-EPS-MIT	2021	Common pipistrelle

4.2 Daylight Survey

The preliminary ecological appraisal (bats) of 34, 36 and 36A, Caversham, Reading, RG4 8DP was carried out by Emma Turnbull on Wednesday 19 August 2020 at 10.30hrs. The weather conditions for the survey were overcast with rain and a temperature of 18 degrees. Equipment used included a high-powered torch, endoscope, a digital camera on a telescopic pole and a ladder.

During the preliminary ecological appraisal (bats), an internal and external inspection of all three properties and the detached garage at 34 Mill Road were carried out to identify any signs of occupation by bats and features that could offer potential roosting sites following standard survey guidelines. Features investigated included:

- Construction of the buildings – soffits, loft space, tiles/slates, lead flashings etc.
- Building condition – structure of roof and walls.
- Internal conditions – microclimate stability, draughts etc.
- Access points – potential entry and exit points for bats.
- Roosting points – cracks and crevices, between underlay and roofing tiles/slates.



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Field signs that would indicate the presence of bats were searched for. These included:

- Bat droppings on the floor and walls of the buildings.
- Feeding remains (particularly butterfly and moth wings).
- Evidence of urine and/or oily staining around possible roost entrances.
- Presence of areas cleared of cobwebs.
- Where a breathable roofing membrane has been fitted staining on the membrane may suggest use by bats.
- Odour can sometimes suggest the present of bats.
- Squeaking and chattering can reveal bats roosting between the tiles and roofing underlay.

Buildings or structures with no bat roosting potential and that were unsuitable for roosting bats were not inspected in detail.

4.3 Constraints

Full access to the site during the visit was made possible by the occupant and there were no constraints to the survey.

5. Survey Findings

5.1 External Inspection

The external features of the three properties and detached garage at 34 Mill Road were examined for signs described in section 4.2. Windowsills, exposed features around the windows, fascia's and walls were inspected for any evidence of bat droppings or staining.

34 Mill Road is an end of terrace building, which is in a fair condition externally, see Figure 6 on page 10. The roof of this property is pitched and covered in close fitting tiles, none of which are missing or broken, see Figure 7 on page 10. The ridge and hip tiles are all close fitting with no gaps in which roosting bats could exploit and the soffits and fascia's are tight to the wall and there were no splits or cracks which could be used by roosting bats, see Figure 8 on page 11. The detached garage at 34 Mill Road was of a concrete and wooden structure and was in a poor condition, see Figure 9 on page 11. The roof had a slight pitch and was covered in asbestos sheets which was tightly fitted, with no gaps in which roosting bats could utilise.

36 Mill Road is the middle terrace property, which is also in a fair condition externally, see Figure 10 on page 12. The roof of this house is pitched and covered in close fitting tiles, none of which are missing or broken, see Figure 11 on page 12. The ridge tiles are all in a good condition with no gaps and the soffits and fascia's are all tightly fitting with no roosting opportunities for bats.

36A is the other end of row terrace house and is also in a fair condition externally, see Figure 12 on page 13. The roof of this property is pitched and covered in close fitting tiles, all of which are in a good condition with no gaps in which roosting bats could exploit, see Figure 13 on page 13. The ground floor roof on the front elevation is joined to the main building with lead flashing, which is tight to the wall, with no gaps in which roosting bats could utilise, see Figure 14 on page 14.

No bats or evidence of bats was recorded during the external inspection of the three properties or detached garage at number 34 and externally there are no obvious visible features on the buildings which could be utilised by roosting bats.



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Figure 6. 34 Mill Road, Caversham. 19.08.20



Figure 7. Example of roof tiles. 34 Mill Road, Caversham. 19.08.20





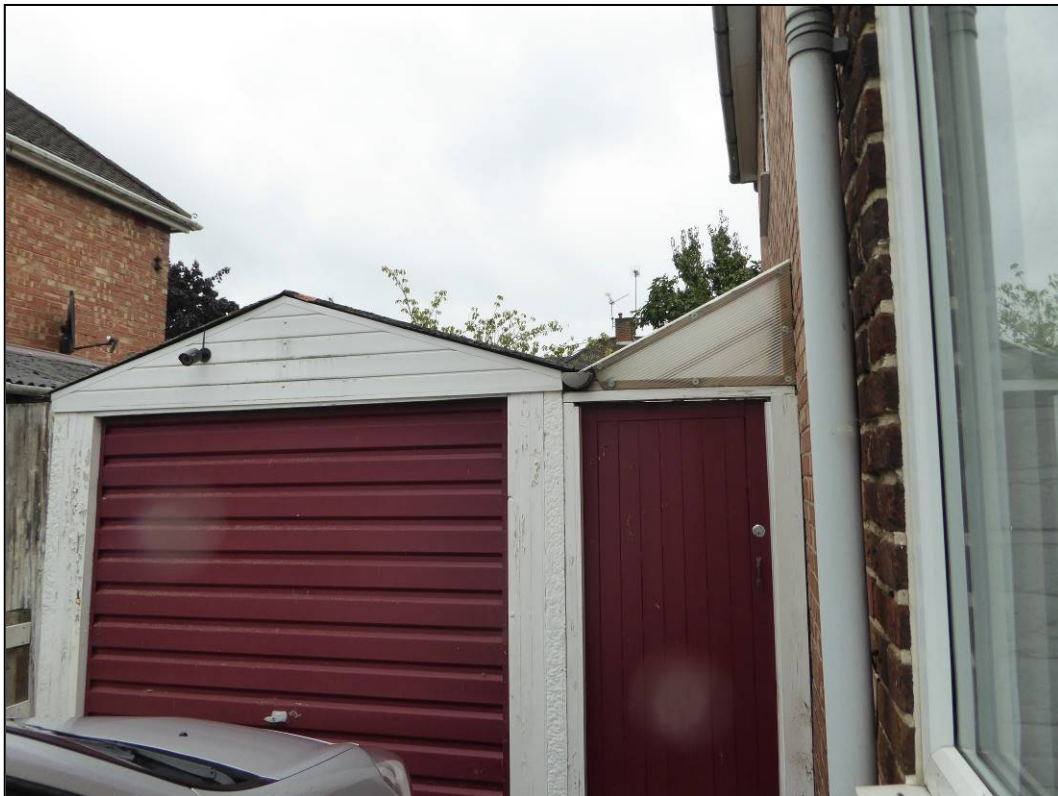
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Figure 8. Example of fascias and soffits. 34 Mill Road, Caversham. 19.08.20



Figure 9. Exterior of garage. 34 Mill Road, Caversham. 19.08.20





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Figure 10. 36 Mill Road, Caversham. 19.08.20



Figure 11. Example of roof tiles, 36 Mill Road, Caversham. 19.08.20





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Figure 12. 36A Mill Road, Caversham. 19.08.20



Figure 13. Example of roof tiles, 36A Mill Road, Caversham. 19.08.20





Figure 14. Example of lead flashing, 36A Mill Road, Caversham. 19.08.20



5.2 Internal Inspection

The loft space of the three properties and the garage at 34 Mill Road were undertaken and examined for any signs of bats (as described in section 4.2).

The loft space of 34 Mill Road was inspected and was in a fair condition internally. The loft was accessed from the first floor via ladders. The loft was cluttered, was not illuminated, partially boarded and partially insulated, see Figure 15 on page 15. The roof tiles were not lined and were exposed, although they were all tightly fitted with no obvious gaps in which roosting bats could enter the building, see Figure 16 on page 15. The garage at 34 Mill Road was also inspected for roosting bats. The garage was cluttered and in a poor condition internally, see Figure 17 on page 16. There was no loft space within the garage, and the asbestos roofing is exposed, although there are no obvious roosting opportunities for roosting bats, see Figure 18 on page 16.

The loft space of 36 Mill Road was also examined and accessed from the first floor via ladders. The loft was cluttered, partially boarded, partially insulated and not illuminated, see Figure 19 on page 17. The loft was partially lined with wooden boards (see Figure 20 on page 17) and partially with bitumen felt (see Figure 21 on page 18), all of which is in a good condition with no splits or tears in which roosting bats could exploit.

The loft space of 36A was also inspected and it too is in a fair condition. The loft was accessed by ladders from the first floor. The loft was uncluttered, partially illuminated, boarded and insulated, see Figure 22 on page 18. The roof tiles were lined with bitumen felt, all of which was in a good condition with no rips or tears that roosting bats could utilise, see Figure 23 on page 19.



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No bats or evidence of bats was recorded during the internal inspection of the three properties or the garage at 34 Mill Road and internally there appeared to be no roosting opportunities for bats.

Figure 15. Loft space of 34 Mill Road, Caversham. 19.08.20



Figure 16. Exposed roof tiles. 34 Mill Road, Caversham. 19.08.20





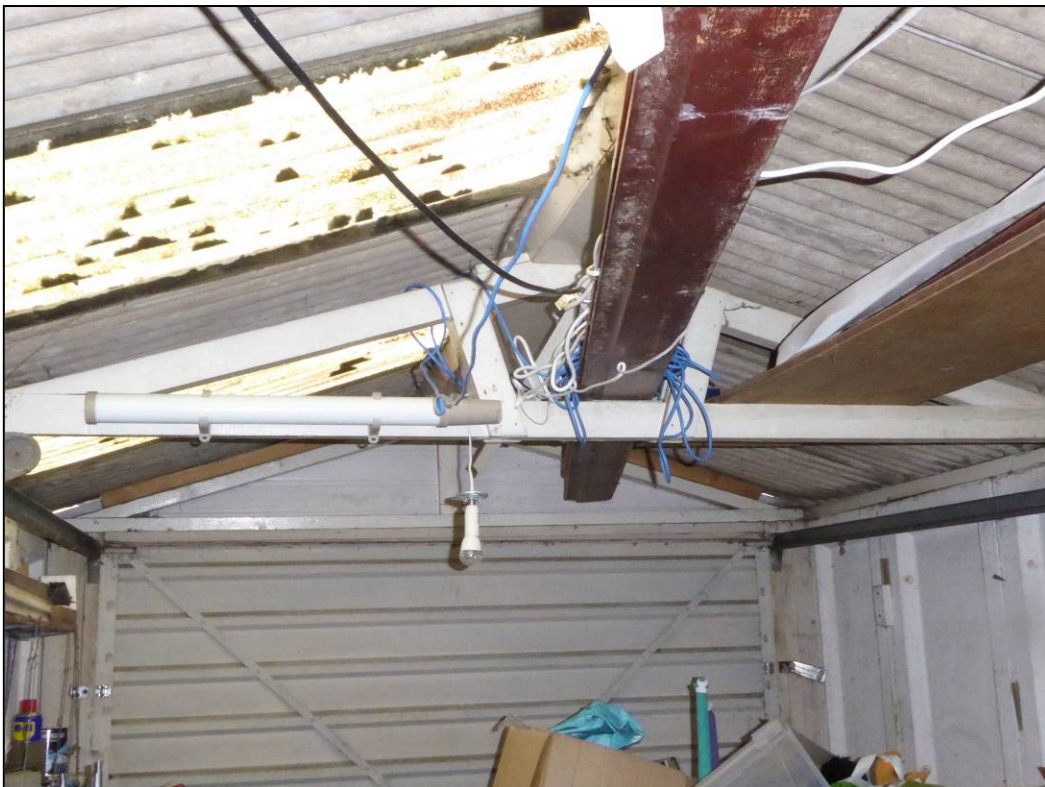
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Figure 17. Internal space of garage, 34 Mill Road, Caversham. 19.08.20



Figure 18. Roof of garage. 34 Mill Road, Caversham. 19.08.20





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Figure 19. Loft space of 36 Mill Road, Caversham. 19.08.20



Figure 20. Example of wooden boarding. 36 Mill Road, Caversham. 19.08.20





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Figure 21. Example of bitumen lining, 36 Mill Road, Caversham. 19.08.20



Figure 22. Example of loft space. 36A Mill Road, Caversham. 19.08.20





Figure 23. Example of bitumen lining. 36A Mill Road, Caversham. 19.08.20



6. Evaluation

The bat roost potential of the features within the site has been assessed with reference to the criteria laid out in the Bat Mitigation Guidelines (Mitchell-Jones, 2004). These criteria are listed on pages 19 and 20 with the features **highlighted in bold**.

The likelihood of bat roosts being present will be higher where structures:

- are of a pre-20th Century construction;
- are in a lowland rural setting;
- **have woodland, mature trees, species-rich grassland and/or water nearby;**
- have large dimension roof timbers with cracks, joints and holes;
- have numerous crevices in stonework and structures;
- have an uneven roof covering with gaps, though not too draughty;
- have hanging tiles or roof cladding, especially on south-facing walls;
- **have a roof warmed by the sun;**
- are disused or little used; largely undisturbed;
- provide appropriate hibernation conditions, such as abandoned mines, tunnels, kilns, or fortifications; or
- **Recent or historical records of bats on the site, or bat roosts in the general area.**



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The likelihood of bat roosts being present will be lower where structures:

- **are in an urban setting with little green space;**
- are subject to heavy disturbance (constant movement due to draughts and noise, also unstable microclimate);
- **have a small, cluttered roof void (particularly for brown long-eared);**
- **are of a modern construction with few gaps or crevices that bats can fly or crawl through (though pipistrelle bats may still be present);**
- are comprised of prefabricated steel or sheet materials; (some sections);
- are active industrial premises.

Please note that the above list provides generic screening criteria only and there are exceptions to consider.

7. Conclusions

7.1 Interpretation

The combined evidence from the internal and external inspection of the three properties and garage associated with 34 Mill Road provides a high level of confidence in support of the opinions as set out in this report. There are no visible features on exterior of the buildings in which bats could roost or access the buildings to roost. Informed by the results of the survey and the factors highlighted in Section 6, it is concluded that there is negligible potential for roosting bats within the buildings. Based on recommendations in the Bat Workers Manual and the Bat Surveys Good Practice Guidelines, no further survey effort is required.

7.2 Contingency Plan

In the unlikely event that bats are found during the proposed works, all work must stop, and advice sought from Urban Tree Experts or another licenced bat ecologist.

If, for whatever reason, there is a time delay of greater than 12 months between this survey and the commencement of work, then the survey should be repeated as the condition of the buildings may have changed and bats could start roosting at the site.

8. References

Collins, J (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd Edition). Bat Conservation Trust (BCT), London.
HM Government (2017) Conservation of Habitats and Species Regulations.
HM Government (1981) The Wildlife and Countryside Act.
HM Government (2006) Natural Environment and Rural Communities Act.
Mitchell-Jones, A.J. & McLeish, A.P. (1999). Bat Workers' Manual (2nd Edition). Joint Nature Conservancy Committee, Peterborough.



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9. Queries

Any queries regarding this report should be addressed, in the first instance, to Urban Tree Experts:

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APPENDIX 1

In summary, the legislation combined makes it an offence to:

- Intentionally or recklessly damage, destroy or obstruct access to a structure or place used for shelter by a bat.
- 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.
- Intentionally or deliberately kill, injure or take any bat.

Planning Considerations:

Government guidance to Local Planning Authorities stipulates the need to consider biodiversity and protected species during the consideration of planning applications. The NPPF makes clear that the planning system should help minimise the impacts that development can have on biodiversity and provide net gains in biodiversity where possible. In addition, the ODPM Circular 04/2005 states *“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision”*.

Policy CS36 of the Reading Borough Core Strategy states *“Development should retain, protect and incorporate features of biodiversity or geological interest (including protected species and their habitats) found within the application site into their schemes. On sites with recognised biodiversity or geological value, development will not be permitted where there would be a direct or indirect adverse impact on the site, unless it can be clearly demonstrated that: -*

- i. The need for development clearly outweighs the need to protect the value of the site; and*
- ii. Appropriate compensation, impact minimisation, mitigation and compensation are provided”*.

Developments that compromise the protection afforded to bats or roosts under the provisions of the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981 will require a European Protected Species (EPS) licence from Natural England (NE).

NE, the government’s statutory conservation advisory organisation, is responsible for issuing EPS licences that would permit activities that would otherwise lead to an infringement of the Habitat Regulations.

Three tests must be satisfied before this licence (to permit otherwise prohibited acts) can be issued:

- Reg 44(2)(e) – the derogation is “in the interests of public health and public safety, or for other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment”.
- Reg 44(3)(a) – there is “no satisfactory alternative” to the derogation.
- Reg 44(3)(b) –the derogation is “not detrimental to the maintenance of the populations of the species concerned at a favourable conservation status in their natural range”.

Tests (a) and (e) can be met with the issue of planning permission for the proposed works. Test (b) is determined by NE’s ecology department that requires the development of a suitable mitigation strategy that would ensure that any bats present on site, are retained at the same population level or better.