

**After Dark
112 London Street
Reading
Berkshire
RG1 4SJ**

Updated Preliminary Bat Roost Assessment

Ref: R2429/a

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1	INTRODUCTION	3
1.1	Background.....	3
1.2	Legislative Background.....	3
1.3	Site Location and Context.....	5
2	SURVEY METHOD.....	6
2.1	Building Inspection.....	6
2.2	Survey Constraints.....	6
3	SURVEY FINDINGS	8
3.1	Introduction	8
3.2	External Survey.....	8
3.3	Internal Survey.....	9
4	DISCUSSION.....	10
5	REFERENCES	11
	APPENDIX 1 - SITE PHOTOGRAPHS.....	12
	APPENDIX 2 – UPDATED PRELIMINARY BAT ROOST ASSESSMENT FINDINGS	14

1 INTRODUCTION

1.1 Background

1.1.1 John Wenman Ecological Consultancy LLP was commissioned by Mr Khan of KK Property Investment Limited to undertake an updated survey for the presence of bats within 'After Dark' – a nightclub at 112 London Street in Reading, Berkshire.

1.1.2 The survey was commissioned in connection with a planning application to be lodged with Reading Borough Council seeking consent to redevelop the site. A preliminary bat roost assessment was carried out in August 2016 and no evidence of roosting bats or bat roost potential was found during the survey. This report details the updated survey findings since the last survey.

1.2 Legislative Background

1.2.1 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 affect significantly the local distribution or abundance of the species;
- Deliberately kill, injure or take any bat.

1.2.2 The government's statutory conservation advisory organisation, Natural England, is responsible for issuing European Protected Species licences 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, and;
- 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”.

1.2.3 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 European Protected Species licensing is necessary before granting planning permission.

1.2.4 European Protected Species mitigation licence 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.

1.2.5 Licensable projects affecting small numbers of seven commonly occurring bat species may fall under the remit of the Bat Mitigation Class Licence (WML-CL21). The Class Licence permits ‘Registered Consultants’ 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.

1.2.6 Survey data supporting EPS licence applications or the registration of the site under the Bat Mitigation Class Licence (WML-CL21) 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.

1.3 Site Location and Context

- 1.3.1** The building is situated on the western side of London Street in Reading, Berkshire (OS Grid Reference: SU 71812 72936).
- 1.3.2** The building is set back from the road, accessed down an alley beyond residential and commercial buildings. The building is located in a very urban area of Reading, heavily lit at night and therefore unlikely to offer much foraging or commuting habitats for bats. The River Kennet that flows through Reading - a known commuting route used by bats - is 330 metres to the north of the site.

2 SURVEY METHOD

2.1 Building Inspection

2.1.1 An updated survey of the interior and exterior of the building was undertaken by an ecologist registered under Natural England bat survey Class Licence CL018 on the 3rd December 2019.

2.1.2 The survey was undertaken with the aid of binoculars, and a high power (1 million candle power) torch and looked 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).

2.1.3 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);
- Bats (live or dead).

2.1.4 Hipped-roofed and flat-roofed buildings may offer potential roosting sites in a number of locations, favoured locations include:

- Under roof, ridge and hip tiles, especially when loose tiles are present or sections of mortar are missing;
- At the eaves – gaining access via gaps between the soffits and wall;
- At the gable ends – access is typically gained at the roof apex via gaps in the soffits or under roof tiles;
- Within an enclosed roof space – long-eared bats (*Plecotus* sp.) for example, will often cluster at the ridge beam.

2.2 Survey Constraints

2.2.1 Full access was available to the exterior of the building, however the roof space was situated above two false ceilings and was too high to access safely. A small area of the hipped roof space was visible from a storage

cupboard and the internal construction could be assessed and therefore there were no significant constraints to the survey.

3 SURVEY FINDINGS

3.1 Introduction

- 3.1.1** Photographs of the site 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 building are described as follows:

3.2 External Survey

- 3.2.1** The building had three connecting roofs: a flat roof at the western end; a higher flat roof in the middle section; and a hipped roof at the eastern end of the building (**Photographs 1 & 2**).
- 3.2.2** The flat elements of the roof were all tightly fitted and did not offer any roosting opportunities for bats (**Target note 1**). The barge boards at the eaves along the northern elevation of all roof sections of the building were, on the whole, fitted tightly to the brickwork (**Photograph 3; Target note 2**). There was the occasional narrow gap, and when inspected closely with a torch, this continued to reveal the gaps to be cobwebbed and they did not extend far enough to provide suitable roosting sites for bats (**Photograph 4; Target note 3**). A brick was missing above two of the ventilation bricks on the northern side of the building but these were blocked by guttering preventing easy access by bats (**Photograph 5; Target note 4**).
- 3.2.3** There was a large hole in the brickwork at the western end of the building but this was large and draughty and did not extend into suitable crevice opportunity for roosting bats (**Photograph 6; Target note 5**). The majority of the southern side of the building comprised of brickwork up to the roof and therefore there were no roosting opportunities for bats (**Photograph 2; Target note 6**). The wooden soffit box on the higher tiled roof was in poor condition and there were large gaps where the boards had started to rot but this was unsuitable for bats (**Photograph 7; Target note 7**).
- 3.2.4** The slate roof tiles on the hipped roof remained flat and fitted tightly (**Photograph 8; Target note 8**). The mortar under the ridge and hip tiles continued to be in place offering no access opportunities for bats (**Photograph 8; Target note 9**). The roof was bowing on one side but this did not create any opportunities for bats.

3.2.5 No bats or evidence of roosting bats was found externally.

3.3 Internal Survey

3.3.1 The majority of the building was flat-roofed with no void spaces and internally the roof was very high with two false ceilings (**Photograph 9**). The roof space in the hipped roof could be surveyed in the north eastern corner where ceiling panels had been removed but a full inspection was not safe to carry out (**Photograph 10**). The roof was lined with tight wooden sarking and a nylon-style roofing felt, which was all intact from the survey viewpoint (**Photographs 10 & 11; Target note 10**).

4 DISCUSSION

4.1.1 The survey revealed limited suitable roosting opportunities for bats, which showed no evidence of their presence, and in combination with the surrounding urban area which is heavily lit and unlikely to be suitable for foraging or commuting bats, the building was considered to have negligible roosting potential for bats. Therefore, the planned development is highly unlikely to lead to the loss of a bat roost or disturbance of bats.

4.1.2 In the unlikely event that bats are encountered during the course of the proposed work, the work should stop immediately and a licensed ecologist called to site to attend to the bat and provide advice on how to proceed; work should not continue until further written advice has been received. At this point, a European Protected Species licence may be required to permit the work to continue lawfully.

5 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. The western end of the building.



2. The southern side of the building.



3. The tight barge boards on the northern side of the building.



4. The narrow gap behind the barge board in places.



5. The missing brick above the ventilation brick but guttering in the way of easy access.



6. Large hole in the brickwork on the western side of the building.



7. The rotting wooden soffit box on the southern side of the hipped roof.



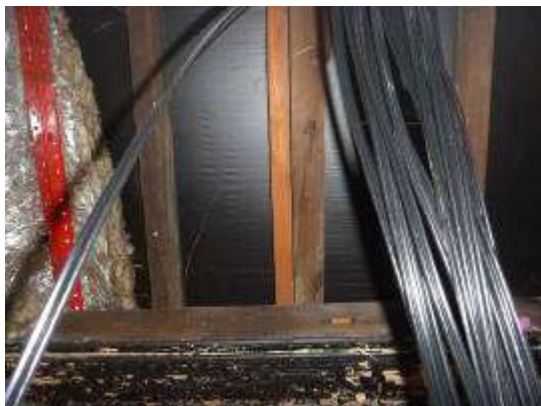
8. The flat slate roof tiles and mortared hip and ridge tiles.



9. The interior of the building with high false ceilings.

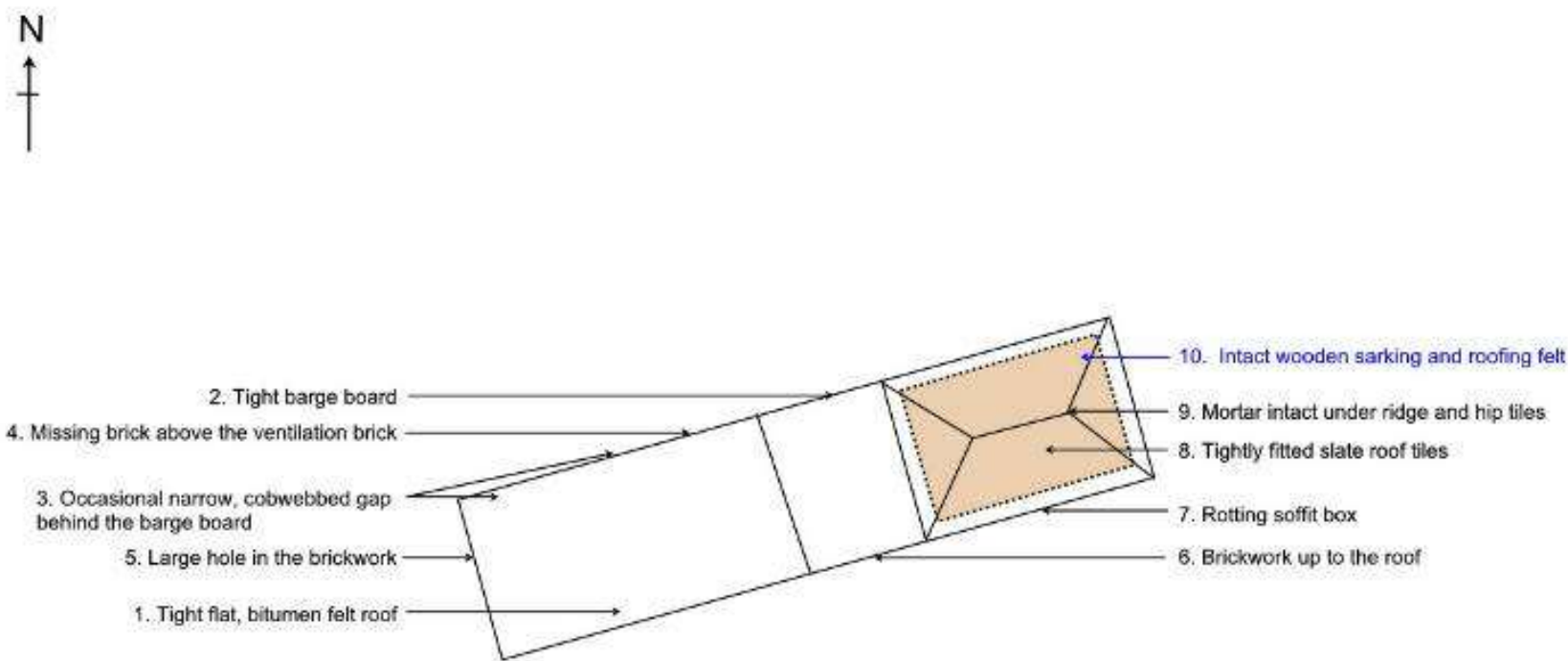


10. The view of the underside of the roof space in the north eastern corner of the building.



11. The nylon-style roofing felt.

APPENDIX 2 – UPDATED PRELIMINARY BAT ROOST ASSESSMENT FINDINGS



 Inaccessible roof space **n.** External target note **n.** Internal target note

Drawn by:	Date	Scale:	After Dark, 112 London Street Reading	
SF	December 2019	Not to scale	Updated Preliminary Bat Roost Assessment Findings	

John Wenman Ecological Consultancy
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