

**6-8 Market Place
Reading
Berkshire
RG1 2EG**

Preliminary Bat Roost Assessment

Ref: R2533/a

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1 INTRODUCTION

1.1 Background

1.1.1 John Wenman Ecological Consultancy LLP was commissioned by Turley to undertake a survey for the presence of bats within the office building at 6 – 8 Market Place 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 renovate, modernise and extend the existing office accommodation.

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. They must therefore consider and determine whether these three tests are likely to be satisfied by planning proposals affecting European Protected Species before granting planning permission.

1.2.4 If a European Protected Species mitigation licence is necessary, a licence can be sought once all the necessary planning consents have been granted. Natural England aims to issue a decision on licence applications within 30 working days of submission.

1.2.5 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), which would enable consultants registered by Natural England, or accredited agents appointed by them, to carry licensable work under the Class Licence once sites have been registered in advance with Natural England. Registration forms must be submitted at least three weeks before work is due to start, and if acceptable, Natural England aims to register sites within two weeks.

1.2.6 Survey data supporting EPS mitigation licence applications or the registration of the site under the Low Impact 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 eastern side of Market Place in the centre of Reading, Berkshire (OS grid reference: SU 71730 73461).

1.3.2 The office building is bordered by other commercial and retail buildings on all sides. Forbury Gardens with parkland trees and amenity grassland is situated 90 metres

to the north. Reading Abbey Ruins are situated just over 200 metres to the east. The River Thames flows approximately 150 metres to the south.

- 1.3.3** Overall, the built up habitats in the immediate surrounding area provides poor quality habitat for commuting and foraging bats adapted to suburban environments; whilst the habitats in the wider area, including the River and formal gardens and mature trees are of moderate value.

2 SURVEY METHOD

2.1 Building Inspection

2.1.1 A survey of the interior and exterior of the building was undertaken by an ecologist registered under Natural England bat survey Class Licence CL18 on the 16th June 2020.

2.1.2 The survey was undertaken with the aid of binoculars and a high power (1 million candle power) torch and looked 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 Flat roofed commercial buildings may offer potential roosting sites in a few locations, favoured locations include:

- Under lifted roof coverings;
- Within cracks and crevices in walls;
- Under sections of raised lead flashing;
- Beneath lifted barge boards;
- At the eaves – gaining access via gaps between the soffits and wall;

2.2 Survey Constraints

2.2.1 Full access was available to the interior and exterior of the offices and therefore there were no significant constraints to the survey.

3 SURVEY FINDINGS

3.1 Introduction

3.1.1 Photographs of the building 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 interior and exterior of the house are described as follows:

3.2 External Survey

- 3.2.1** The office block was of simple concrete construction with a flat roof. The roof had two tank rooms (hereafter referred to as tank rooms 1 & 2) on the roof (**Photographs 1 & 2**). The building's concrete façade comprised flat and raised sections of concrete between the windows and had no visible crevice opportunities suitable for bats. The main roof – accessible via the tank room - was covered in bitumen felt that was flat and tightly fitted, offering no access opportunities for bats (**Photograph 3; Target note 1**).
- 3.2.2** Tank room 1 was situated to the front (north western) side of the building. It had rendered walls with a couple of vents at ground level on the eastern side and one towards the top of the wall on the southern side (**Photographs 4 & 5; Target notes 2 & 3**). The western end of the northern elevation was not accessible from the roof top due to its proximity to the roof edge (**Photograph 6**). The narrow fascia's around the building had some narrow gaps in places apart from on the eastern elevation where it was tightly fitted (**Photographs 7 & 8; Target notes 4 & 5**). The gaps were of very limited extent and was not considered to be suitable for use by bats; furthermore, on close inspection there was no evidence of use by bats.. Part of the render had come away from the building's wall on the eastern elevation creating a gap behind, which on close inspection showed no evidence of use by bats (**Photograph 9; Target note 6**).
- 3.2.3** A second tank room was situated at the eastern end of the building. The building had rendered walls. The eastern elevation had a door and two large vents with wire mesh preventing access into the interior (**Photograph 10; Target note 7**). A boarded-up opening/doorway, which no longer had any doors, was present on the western elevation. This lacked any opportunities suitable for bats (**Photograph 11; Target note 8**).. A wooden door was also present on the western elevation which had some gaps into the interior, however the features were not suitable for use by

bats (**Photograph 12; Target note 9**). The fascia's around the building had some narrow gaps in places apart from on the western elevation where it was tightly fitted (**Photographs 13 & 14; Target notes 10, 11, 12 & 13**).

3.2.4 No evidence of bats was visible on the exterior of the building at the time of the survey.

3.3 Internal Survey

3.3.1 Tank Room 1 was accessible via a loft hatch from the interior of the offices below. The western end comprised a lift room, which was inaccessible. The room had brick walls with windows on the northern elevation (**Photograph 15**). Two water tanks were present in the room. The flat roof was lined with concrete (**Photographs 16; Target note 13**).

3.3.2 Tank Room 2 was partly accessible via the boarded up doorway. The southern end was inaccessible, but a tank was visible through a doorway. An old tank was present at the northern end, which was covered with pigeon droppings (**Photograph 17**). The floor and roof were lined with concrete with no visible crevices. (**Photograph 18; Target Note 14**).

3.3.3 The interiors of the tank rooms lacked any crevices suitable for roosting bats and no evidence of bats was visible in the two tank rooms at the time of the survey.

4 DISCUSSION AND RECOMMENDATIONS

4.1 Assessment of Bat Roost Potential

4.1.1 The building was of simple flat roofed and concrete construction and offered features of very limited suitability for use by crevice-dwelling bat species such as the pipistrelles (*Pipistrellus* spp.) and/or small *Myotis* species. Furthermore, its immediate surroundings were built up and poor habitat for bats, and no evidence of the presence of roosting bats was found inside or on the exterior of the tank rooms during a close inspection. Therefore, the building is considered to be of negligible bat roost potential and it is considered highly unlikely that the building supports roosting bats.

4.2 Impact of Proposals and Recommendations

4.2.1 The proposed works includes the renovation, modernisation and extension of the office accommodation with a new façade and roof top terrace amongst the work proposed. The existing building showed no signs of the presence of bats and furthermore is of very limited suitability for bats. Therefore, it is considered highly unlikely that the proposed building works will have any impact on bats or their roosts.

4.2.2 In the unlikely event that bats are encountered during the course of the building work, the work must stop immediately and a licensed ecologist be 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 mitigation 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. Front of the building viewed from the west.



2. Front of the building viewed from the west.



3. Bitumen felt tight on the floor of the roof.



4. Tank room 1 with rendered walls and vents on the eastern side.



5. Vent and doorway on the southern side of Tank Room 1.



6. View of the northern side of the tank room which was not accessible.



7. Gaps behind some of the fascia's on tank room 1.



8. Fascia tight at the eastern elevation of tank room 1.



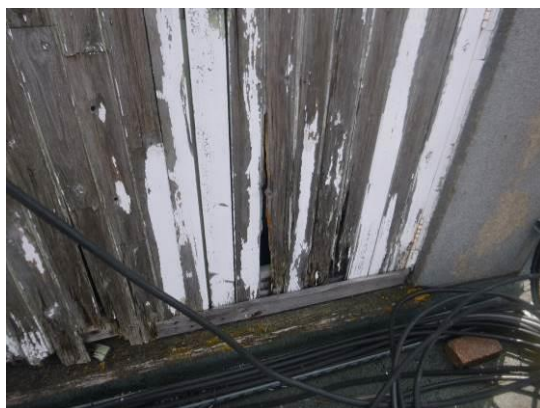
9. Part of the rendered wall coming away from the wall of tank room 1.



10. Tank room 2 with rendered walls with two large vents filled with wire mesh.



11. Boarded window on the western elevation of tank room 2.



12. Gaps in the timbers of the door on tank room 2.



13. Narrow gaps behind the fascias around Tank room 2.



14. Tightly fitted fascia on the western elevation of Tank Room 2.



15. Internal view of tank room 1 with two water tanks.



16. Roof lined with concrete in tank room 1.

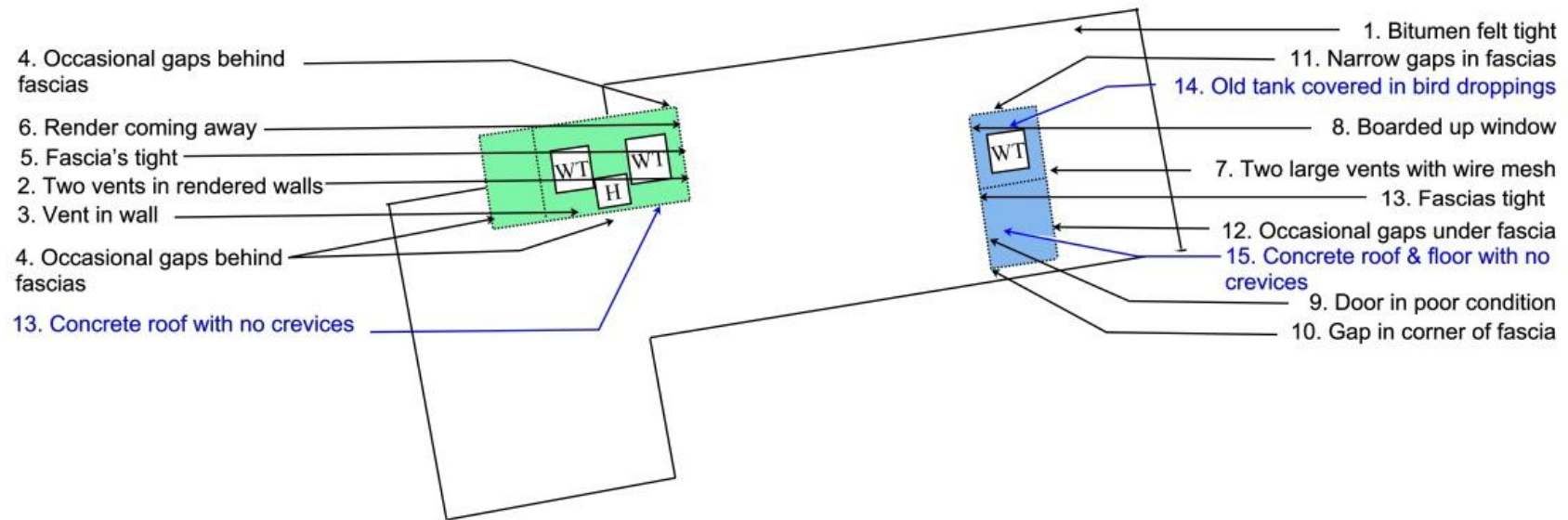


17. Internal view of tank room 2 with a lift room and old water tank covered with pigeon droppings.



18. Roof lined with concrete in tank room 2.

APPENDIX 2 – PRELIMINARY BAT ROOST ASSESSMENT FINDINGS



n. External Target Note

n. Internal Target Note



Tank Room 1



Tank Room 2



Water tank



Loft hatch

Drawn by:	Date	Scale:	6 - 8 Market Place Reading	
VP	June 2020	Not to scale	Preliminary Bat Roost Assessment Findings - Rooftop Plan	

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