

Preliminary Bat Roost Assessment (PBRA) Report

Stokes House, Ham Street, Richmond TW10 7HR



Author: Tony Stones BSc (Hons) MSc, MCIEEM, CEnV

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DOCUMENT CONTROL

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Author	Tony Stones BSc, MSc, MCIEEM Ecologist	A J Stones.

Biological Records of species identified during this survey, the date, their location and a brief description of the circumstances of their identification, may be passed on to Biological Records Centres, local wildlife groups, the Wildlife Trust, Natural England and other interested parties unless written instructions not to do so are received within 30 days of receipt of this.

1. Summary

TSA Ecology was commissioned to undertake a Preliminary Bat Roost Appraisal (PBRA) at the property known as Stokes House, Ham Street, Richmond TW10 7HR. The areas inspected were the void above a section of roof to be extended, the single storey swimming pool outbuilding due for demolition, and an external outbuilding due for demolition. An internal examination of the main roof void undertaken on 15th March 2023 indicated no evidence of bats using the void internally. No suitable roost opportunities, nor evidence of the presence of bats, was observed in either of the other buildings.

The conclusion therefore is that **there are unlikely to be bats present at the site, the proposed works have negligible potential to affect these species, and no further surveys are necessary.**

However, it is to be noted that bats are mobile species, fully protected under the Wildlife and Countryside Act 1981 (as amended). Should roosting bats be suspected or encountered during demolition, then works should cease immediately, and an ecologist consulted for advice on how to proceed. For full details of relevant legislation, see Appendix A.

The PBRA findings are valid for 12 months. If no works have been undertaken in respect of the roof of the property by 15 March 2024, it is recommended that the structure is re-assessed for its potential to support bats.

2. Introduction

2.1 Background

The client is proposing to remove the existing roof to the coach house at the north-east of the property, and replace this with an extension, which will fall short of reaching the eaves of the main property. The adjacent single storey building currently housing a swimming pool will be demolished and rebuilt. The adjacent outbuilding to the rear of the main house will also be demolished and rebuilt.

2.2 The Site

The site is located adjacent to Ham Street in Richmond, approximate OS grid reference TQ 2262 7746 under the jurisdiction of the London Borough of Richmond-upon-Thames. It comprises a three-storey main house with attached single-storey outbuilding, and adjacent single storey swimming pool building to the east. The property has a rear, lawned garden with shrubs and trees present. The property is currently unoccupied.

The site sits adjacent to a busy village through road, and is fairly central to the village of Ham, with a combination of residential development, along with green open spaces such as Ham Common and Ham Lands Local Nature Reserve (LNR) adjacent to the River Thames on three sides, being c. 500 m distant, to the west, at its closest point. Between the property and the river, lies the Local Nature Reserve. To the east lies more suburban residential development backed by a school sports ground and a tennis club.

2.3 Purpose of the Assessment and Report

- Assess the potential presence / absence of bats through an internal and external building inspection;
- Determine if the development would result in unlawful impacts to bats, or their roosts; and,
- Advise of any mitigation measures and proportional enhancement measures to ensure the proposed works proceed lawfully.

3. Desk Study

3.1 Methodology

A data search was undertaken, to assess the bat species known to have been present within the locality, and those that could potentially be impacted by the proposed development. The consultees were:

- London Bat Group (Bat records for a 2 km radius of the site for 2012-2022).
- MAGIC (Granted European Protected Species licences (EPSL) pertaining to bats, within a 5 km radius of the site, from 2012-2022).

3.2 Results

The London Bat Group (LBG) returned 238 records for nine species commonly found on the urban fringe of London during the past 10 years (see Table 1). Most records are from a small number of sites including St. Peter's Church, Petersham, Richmond Park, Ham Common, and unidentified sites in Richmond.

Species	No. of Records	Location of Closest Record	Date of Most Recent Closest Record	Most Recent Record	Location of Most Recent Record
Brown long-eared	9	St. Peter's Church, Church Lane, Petersham, c. 1300 m NE	23/08/2019	23/08/2019	St. Peter's Church, Church Lane, Petersham, c. 1300 m NE
Common pipistrelle	51	Ham Common, Ham c. 570m SE	20/09/2017	29/07/2021	Richmond Park (key site 120448)
Daubentons	14	London Wetland Centre, c. 680 m SE	20/09/2017	15/08/2021	Ham (key site 110072)
Leislars	3	Ham Lands, c. 900m W	04/10/2019	04/10/2019	Ham Lands, c. 900m W
Nathusius' pipistrelle	3	Pen Ponds, Richmond Park, c. 1300m E	29/05/2016	26/05/2019	River Thames: Marble Hill Park
Natterers	1	St. Peter's Church, Church Lane, Petersham, c. 1300 m NE	06/08/2019	06/08/2019	St. Peter's Church, Church Lane, Petersham, c. 1300 m NE
Noctule	29	Ham Common, Ham, c. 570m S	14/08/2013	27/07/2021	Richmond Park (key site 120448)

Serotine	10	St. Peter's Church, Church Lane, Petersham, c. 1300 m NE	18/07/2016	16/07/2020	Isabella Plantation, Richmond Park
Soprano pipistrelle	71	Ham Common, Ham c. 570m S	06/08/2017 & 23/08/2017	29/07/2021	Richmond Park (key site 120448)

Table 1: Bat Species Recorded and Proximity of Records within Past Decade

Seven roosts were recorded of at least three species from within 2 km of the proposed development site. A roost of brown long-eared bats was present at St. Peter's Church, Church Lane, Petersham (10/06/2015 and 06/08/2019), and in Richmond (2015-2017). Two roosts of Pipistrelle sp. were recorded, both in Twickenham, with a roost of common pipistrelle present at Ham Common (all three records from the same location in 2013). Two roosts of Soprano pipistrelle were recorded, one in Orleans House Gardens, Twickenham (01/10/2016) and the second in Manor House, River Lane, Petersham (01/07/2021).

There have been 16 consented European Protected Species Licences (EPSLs) within 5 km of the site (MAGIC 2023), the closest being 1.1 km SW, for the destruction of the resting place of Soprano pipistrelle in 2015.

Five more licences were granted for up to 5 km of the site for works affecting common and Soprano pipistrelles.

4. Survey

4.1 Methodology

Preliminary Bat Roost Appraisal

An external and internal survey of the property and the adjacent extensions, including the roof structures, was carried out on 15th March 2023. The survey was undertaken by Tony Stones MSc, MCIEEM, CEnV of TSA Ecology. Tony is an experienced bat surveyor with over 25 years of experience in the ecological sector. Tony has undertaken various preliminary ecological assessments, preliminary roost assessments (bats) and surveys for protected species; and prepared subsequent reports with appropriate recommendations. Binoculars, a step ladder, and a high-powered torch were used as required.

Date	Approximate Start Time	Weather Conditions
15.03.2023	14.30	Mostly cloudy. Wind S 19 km/h, gusting to 35 km/h. Visibility was good and the air temperature was 9 degrees centigrade.

Table 1: Time and Weather Conditions During Survey

The property was assessed for its potential to support bat roosts. This involved a consideration of various factors including:

- Light levels;
- Temperature regime and protection from weather;
- Access to the interior of the building or to other suitable roost sites;
- Potential roost sites;
- Building construction; and

- Habitat context.

Based on these factors, an assessment was made as to whether or not the building could potentially support bats, and the type and number of roosts that might be present.

External Inspection for Signs of Bats

An external inspection was made of the building for any evidence of bat use, such as live or dead bats, droppings, scratch-marks, staining and prey remains, and in some cases the absence of cobwebs, where access permitted. A pair of 8 x 30 binoculars was used to scan potential ingress / egress points, and other areas of interest from ground level.

Features identified as possible bat access points or potential roosting locations were thoroughly searched where possible, using a powerful torch and binoculars to facilitate the process. Large quantities of cobwebs in roof voids or in access points tend to be suggestive of no bat use, although this evidence is not conclusive.

The survey commenced at the front (eastern face) of the property and proceeded in a clockwise direction around the property.

Internal Roof Void Inspection

The main built structure (Stokes House) has a limited number of internal roof voids, but is built out in certain sections. It was possible to access the void at the front of the property where the main extension is proposed (see Photos 1, 2, 8 and 9, Appendix B). This was searched for evidence of any evidence of bat use, in particular signs such as ingress / egress points, live or dead bats and droppings, where access permitted. There were no roof voids present within the flat-roofed, swimming pool building (see Photos 11, 12 and 13, Appendix B) nor the adjacent outbuilding, which appeared to have been re-roofed fairly recently (see Photos 14 - 17, Appendix B).

Constraints and limitations

The survey was undertaken at a suitable time of year to conduct a preliminary bat roost assessment. What appeared to be the roof void of the former coach house was not accessible as there was no access point into it.

4.2 Results

Bats: Assessment of Habitats

In addition to the built structure, vegetation within the site boundary comprises a large, lawned side garden, with associated beds of introduced shrubs and some semi-mature trees close to the property boundary (Photos 6 and 7, Appendix B). The rear garden is lawned with introduced shrubs and some semi-mature trees along the periphery (Photos 6 and 7, Appendix B). Many of the adjacent properties have gardens so there are reasonable habitat linkages to the grounds of the property.

Internal / External Building Inspection

Building description

The main property is brick-built and dates from c. 1760 (Photos 1-4, Appendix B). The roof of the main property is largely built-out or flat-roofed (Photos 8,9 and 14, Appendix B). The chimneys on the main roof appeared to be in good condition (Photo 5, Appendix B). An inspection was made of the internal roof void and the roof was accessed externally in this location (Photos 6 and 7, Appendix B) to seek evidence of the presence of bats (droppings, remains, evidence of internal ingress / egress etc.). No such evidence was forthcoming.

The flat-roofed single storeyed swimming pool building is much more recent, dating perhaps from the 1980s or 1990s, brick-built with plastic bargeboards, and flat concrete roof, with no ridge nor loft space.

The outbuilding extension to the rear of Stokes House appears to be of a similar age to the main property but looks to have been recently re-roofed. There is no roof void and no access from the roof into the building itself (Photos 8 and 9, Appendix B). The brickwork internally has some cracks and gaps and these were assessed for the potential presence of bats (Photos

10 and 11, Appendix B). There were no missing or slipped tiles and the ridge was intact (Photos 12 and 13, Appendix B). No gaps were evident along the bargeboard along the western frontage of the property.

Overall the roof of Stokes House appears to be in very good condition externally, and there do not appear to be any ingress / egress points which bats could make use of, e.g. under tiles, into the ridge, or indeed into the void itself. Similarly, this applies to both the flat-roofed swimming pool building, and the outbuilding extension to the rear of the main property.

Therefore, overall it is considered that the buildings have 'negligible' potential to support roosting bats and it is not recommended that it requires any further survey with respect to bats. It is recommended that should a bat / bats be discovered to be present during demolition works, then all works should cease, and a licenced bat worker be asked to attend and provide advice in respect of licencing etc.

5. Conclusions

The results of the assessment indicate that roosting bats are considered likely to be absent.

The roof where the works are proposed appeared to support no features to support roosting bats. Taking into account the lack of suitable features, it is considered that **the proposed development has negligible potential to disturb or harm roosting or foraging bats.**

However, it is to be noted that they are mobile species, fully protected under the Wildlife and Countryside Act 1981 (as amended). Should roosting bats be suspected or encountered during demolition, then works should cease immediately, and an ecologist consulted for advice on how to proceed.

6. References

Collins, J. (ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (3rd edn.). The Bat Conservation Trust, London.

MAGIC (2022) <https://magic.defra.gov.uk/MagicMap.aspx> [Accessed 24/03/2023].

APPENDIX A

Wildlife and Countryside Act 1981 (as amended).

Species listed under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) are afforded protection subject to the provisions of Section 9.

A person will be guilty of an offence if they:

(1) intentionally kill, injure or take any wild animal included in Schedule 5, have in their possession or control any live or dead wild animal included in Schedule 5 or any part of, or anything derived from, such an animal;

(2) intentionally or recklessly—

(a) damage or destroy any structure or place which any wild animal specified in Schedule 5 uses for shelter or protection;

(b) disturb any such animal while it is occupying a structure or place which it uses for shelter or protection; or

(c) obstruct access to any structure or place which any such animal uses for shelter or protection.

(5) Subject to the provisions of this Part, (a) sell, offer or expose for sale, or have in his possession or transports for the purpose of sale, any live or dead wild animal included in Schedule 5, or any part of, or anything derived from, such an animal; or (b) publish or cause to be published any advertisement likely to be understood as conveying that they buy or sell, or intends to buy or sell, any of those things, (6) In any proceedings for an offence under subsection (1), (2) or (5)(a) relating to an act which is mentioned in subsection (1), (2) or (5)(a), the animal in question shall be presumed to have been a wild animal unless the contrary is shown. Species listed on Annex II and Annex IV of The Conservation (Natural Habitats &c.) Regulations 1994 (the Habitats Regulations) which transpose into UK law Council Directive 92/43/EEC of 21st May 1992 on the Conservation of Natural Habitats and of Wild Fauna and Flora (often referred to as the 'Habitats [and Species] Directive.') are afforded further protection. The former Annex relates to the designation of Special Areas of Conservation (SACs) for some species. Inclusion on Annex IV ('European protected species') means that member states are required to put in place a system of strict protection as outlined in Article 12, and this is done through inclusion on Schedule 2 of the Regulations. Regulation

39 makes it an offence to: Deliberately capture or kill an animal listed on Schedule 2
[Regulation 39(1)(a)] Deliberately disturb an animal listed on Schedule 2[Regulation 39(1)(b)]

APPENDIX B



Photo 1: Main view of front of property from Ham Street, where main extension is proposed



Photo 2: View of ridge and slate tiles at front of property



Photo 3: Recent well-sealed flashing on ridges, and intact soffits



Photo 4: Brick ridge and slate tiles



Photo 5: Soffits at front of main house



Photo 6: View west into side (main) garden of property



Photo 7: Adjacent garden planted with non-native species



Photo 8: Interior of roof void, western end



Photo 9: Interior of roof void, eastern end



Photo 10: Rear of pitched roof (northern aspect) as viewed from external hatch to roof



Photo 11: Flat-roofed building containing swimming pool adjacent to Stokes House



Photo 12: Eastern face of single storey building housing swimming pool



Photo 13: View of swimming pool building in relation to Stoke House



Photo 14: Single storey rear extension to Stoke House, functioning as outside storage building



Photo 15: Northern face of storage building



Photo 16: Wooden bargeboards along top of single storey outbuilding



Photo 17: Internal view of outbuilding



Photo 18: Internal view of outbuilding



Photo 19: Northern elevation of former coach house



Photo 20: View of former coach house roof with glass conservatory roof to the rear



Photo 21: Sealed brick tile ridge and slate tile roof of former coach house



Photo 22: Southern face of former coach house roof with conservatory roof adjacent



Photo 23: Brick chimney with evidence of recent re-pointing

