

### **Preliminary Bat Roost Assessment for 224 Bath Road, Bristol**

A Preliminary Bat Roost Assessment (PRA) was completed for 224 Bath Road, Amos Vale, Bristol BS4 3EQ. The proposals relate to loft conversion and reconfiguration of the roof. The site is located at central Ordnance Survey Grid Reference TL04863802.

The survey aimed to identify features suitable for use by protected species and identify any evidence which may indicate use by protected species, particularly bats and nesting birds. This included the following objectives:

- To identify any designated nature conservation sites on or in the vicinity of the property;
- To record any habitats of ecological importance;
- To identify whether there is any evidence of or potential for protected or notable species to be present and impacted by the proposals;
- To detail requirements for further surveys and a Natural England mitigation licence(s), if needed;
- To make suggestions for avoidance, mitigation, compensation measures and working practices to meet legislative and best practice requirements; and
- To make recommendations for ecological enhancement measures.

A letter-style report has been produced, proportional to the scale of the proposals. Biodiversity Net Gain regulations under the Environment Act 2021 do not apply as vegetated habitats will not be changed.

There are 18 species of bats in the UK, all of which are fully protected under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). They are also included in Schedule 2 of the Conservation of Habitats and Species Regulations 2017 (as amended). The Wildlife and Countryside Act, the "Habitats Regulations" and the CRow Act 2000 together make it an offence, among other things, to recklessly, intentionally or deliberately:

- Disturb roosting bats or obstruct access to their roosts;
- Disturb a significant number of bats (whether in a roost or not);
- Damage, destroy or obstruct access to bat roosts;
- Kill, injure or capture (or take) bats.

A bat roost is defined as "any structure or place (including trees) which any bat uses for shelter or protection". Because bats tend to re-use the same roosts, legal opinion is that the roost is protected whether or not the bat(s) are present at the time.

Statutory protection is given to nesting birds in the UK under the Wildlife and Countryside Act 1981 (as amended). It is an offence to intentionally kill, injure or take any wild bird or take, damage or destroy its nest whilst in use or being built, or take or destroy its eggs. In addition, it is an offence to intentionally or recklessly disturb species listed on Schedule 1 of the Act while they are nest building or at/ near a nest with eggs or young, or to disturb the dependent young of such a bird.

Other wildlife legislation is not of relevance due to the nature of the proposals.

This is a brief summary of the legislation and is not to be regarded as a definitive legal opinion. When dealing with individual cases, the client is advised to consult the full texts of the relevant legislation and obtain further legal advice.

## **Methodology**

A Bristol Regional Environmental Records Centre (BRERC) data search was not completed for records of protected and notable species due to the small scale of the proposals. Internationally and nationally designated sites up to a 1km from the site and Special Areas of Conservation (SACs) designated for bat species up to 10km from the site were identified using MAGIC mapping. Aerial photographs and Ordnance Survey maps were also reviewed to assess the site in context of surrounding habitats. Records for protected species licence data submitted to MAGIC mapping by Natural England within 1km were also reviewed. A search was completed for planning applications with ecological information of relevance within the postcode area.

The internal and external building inspection was undertaken in accordance with *Bat Surveys for Professional Ecologists - Good Practice Guidelines* 4th Edition (Collins Ed., 2023), *Bat Mitigation Guidelines* (Reason and Wray, 2023) and the *Bat Workers Manual* (Mitchell-Jones and McLeish, 2004). The survey was completed on 4 November 2025 by Sarah Dale (MCIEEM and Natural England bat survey Class 2 licence holder 2018-36720-CLS-CLS), an experienced ecologist with 19 years of professional bat work.

The roof space was inspected for evidence of roosting bats. The northern elevation of the building was observed from ground level paying particular attention to potential access points for bats. The southern elevation could not be seen from ground level as access was not possible, although a photograph of the rear (southern) roof has since been provided. Features were searched for evidence of use by bats where access was possible and where these could be inspected with a flexible endoscope and 4m ladder. This included a full inspection of the loft. Signs of bats include live animals, corpses, noises, droppings, urine staining, feeding remains (e.g. moth and butterfly wings) and scratches. Where present, these signs were recorded and mapped. Any evidence of nesting birds was also recorded. The building was categorised using the criteria in Table 1.

**Table 1: Bat Roost Potential Categories**  
(Category descriptions drawn from Collins, 2023 and Reason and Wray, 2023)

Roost Potential	Description
Confirmed	Confirmed signs of bat presence/ occupation (droppings, oily staining around entry points, insect remains, odour, scratching) or actual bat presence (live or dead bats).
High	A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions (for example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance) and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.
Moderate	A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions (for example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance) and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions (for example, in terms of temperature, humidity, height above ground level, light levels or levels of disturbance) and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site but could be used by individual hibernating bats).
Negligible	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion. (Note: Negligible is defined as 'so small or unimportant as to be not worth considering, insignificant'. This category may be used where there are places that a bat could roost or forage (due to one attribute) but it is unlikely that they actually would (due to another attribute).
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).

Constraints: All of the building was accessible internally. Externally, there was only access to observe the building from the northern elevation as access into the garden to the south was not possible at the time of the survey. The assessment has therefore been completed based on the evidence within the loft space, general condition of the roof and photographic evidence of the southern aspect of the roof provided by the client.

The loft could not be fully directly access for inspection due to a layer of dense insulation making direct access unsafe. The loft had not been disturbed for a long period of time and was open. Any accumulations of droppings should have been evident.

A survey is only a sample of activity at a site. Wildlife can colonise or move between sites; future or dynamic use of the site has been considered within the recommendations.

### Site Context and Desk Study

The site comprises a three-storey terraced house located to the south of Bath Road. There are attached houses of a similar nature to the east and west, with gardens to the south. There is a band to the woodland to the south of the gardens which links into the grounds of Amos Vale to the south-east. The River Avon lies 40m to the north, across the Bath Road. Therefore, there is optimal foraging habitat for bats in immediate proximity.

The River Avon New Cut Local Nature Reserve lies 950m to the west.

The Bristol area has a relatively high bat biodiversity supporting at least thirteen species including common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus*, Nathusius' pipistrelle *Pipistrellus nathusii*, lesser horseshoe *Rhinolophus hipposideros* (including at Amos Vale), serotine *Eptesicus serotinus*, noctule *Nyctalus noctula*, Leisler's *Nyctalus leisleri* and brown long-eared *Plecotus auritus* bats. There is a recent record of a Natural England bat mitigation licence 670m west for soprano pipistrelle, serotine, brown long-eared and whiskered *Myotis mystacinus* bats.

There are numerous known populations of bird species within North Somerset including Birds of Conservation Concern (RSPB, 2021). This includes red and amber list species, which have been subject to recent declines, such as house sparrow *Passer domesticus* and starling *Sturnus vulgaris*. The RSPB Swift *Apus apus* Mapper ([swiftmapper.org.uk](http://swiftmapper.org.uk)) shows swift records within 500m of the site, but none in immediately proximity along Bath Road.

There are no planning applications within the postcode area with ecological information of relevance.

### Preliminary Bat Roost Assessment

The property is a three-storey building constructed of intact brick and stone. The proposals relate to the loft space and roof coverings above the third storey. There are no gaps in the brickwork. This currently comprises a monopitched roof on an east-west access with concrete/stone parapet walls between each terrace so roofs are not connectivity. Roofs are covered with clay interlocking tiles which are well sealed. There are no missing or slipped tiles on the north elevation and there do not appear to be missing or slipped tiles on the south elevation. The roof appears to be sealed, without any access for roosting bats. Flashing where the roof ties into parapet walls also appears to be flush and sealed. uPVC soffits and guttering on the north elevation appears to be fully sealed under the front (north) eaves. On the south elevation, the under-eaves features appear to be the same and are unlikely to offer potential access or roost features.

Internally, the loft is 5m x 4m and 2.5m high. The tiles are lined with intact breathable roofing membrane. It is understood that the roof was repaired and reroofed approximately 3-4 years ago. Gable ends and eaves are fully sealed. There was a thick layer of insulation between joists on the floor, which was covered with dense dust. No droppings were evident within the loft. There was no other evidence of use by bats or nesting birds. There was no obvious access for bats into the loft.

Overall, the building is considered to have negligible bat roost potential based on the lack of obvious bat roost features, recent re-roofing and no evidence of use by bats or birds within the loft. There is also unlikely to be a risk to nesting birds. No other habitats will be impacted.

### **Impact Assessment and Recommendations**

There is negligible risk of direct or indirect impacts on designated sites for nature conservation due to the scale and location of the proposals.

Bats and their roosts are protected under the Conservation of Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). Bat surveys are only required when there is 'reasonable likelihood' of presence and impacts (ODPM Circular 06/2005). In this instance, due to the recent reroofing, good condition of the roof and lack of evidence of use, the building is currently considered to have negligible potential to support roosting bats.

Works must proceed with caution, with contractors instructed to remain vigilant for roosting bats. Roof coverings and linings will need to be removed by hand, lifting rather than scraping during removal. If bats or their roosts are suspected to be present (e.g. live/dead bats found, audible squeaking or accumulations of droppings which crumble to a glittery dust), all works must cease and an ecologist contacted for advice. A Natural England bat mitigation licence would be likely to be required for works to proceed lawfully.

If works have not proceeded before 1 November 2027, an update survey should be completed as the condition of buildings can change over time, becoming more suitable for use by roosting bats.

Given the nature of the works, additional light spill of any significance onto adjacent habitats including the garden and trees to the south is unlikely. Any additional lighting must be sensitively designed in accordance with best practice as set out in *Bats and Artificial Lighting at Night* (ILP, 2023) as light-sensitive bat species are likely to be present in the nearby area.

There is a very low risk of nesting birds currently being present in the building. If any active birds' nests are unexpectedly found or suspected to be present within the area of works during the check, or at any time during re-roofing, works must cease immediately. Active nests will need to be left along with a suitable buffer area until the chicks have fledged. The time until fledging varies dependent on species but can take up to six weeks. The main nesting bird season is March to August inclusive.

There is negligible risk to other protected or notable species due to the nature of the works.

Although mandatory requirements for Biodiversity Net Gain under the Environment Act 2021 do not apply, schemes should deliver proportional enhancement for biodiversity in accordance with national and local planning policy.

An additional feature for nesting birds such as a universal bird brick/swift nesting feature(s) <https://www.swift-conservation.org/Nestboxes%26Attraction.htm> could be integrated into the revised

roof layout. Swift boxes should be sited in pairs as they are colony nesting birds and with at least a 4-5m drop zone. Bird boxes should be sited on northern elevations or out of direct sunlight e.g. tucked under eaves.

A feature suitable for roosting bats could be incorporated into the building or roof, ideally at least 4m above ground level on a south or west-facing elevation. Options include:

- An off-the-shelf feature integrated into a new soffit or fascia board (see [Soffit Bat Box \(wildcare.co.uk\)](http://wildcare.co.uk)) or a bespoke roosting opportunity created by leaving 2-3cm access gaps or holes under boards. Ideally, the soffit would be wood or rough-surfaced (i.e. not uPVC) for this option to be most effective;
- Bat tubes such as Schwegler 1FR;
- Bat bricks such as lbstock brick or Habibat box; or
- Attached bat boxes such as Schwegler 2FE or Beaumaris woodstone boxes, although these often degrade more rapidly or become detached over time.

These features are self-contained and do not allow bats into living spaces. They are likely to require minimal ongoing maintenance.

## Site Photographs



P1 Main loft



P2 Roof structure



P3 Interior of main loft



P4 Northern elevation





P5 Roof of north elevation



P6 Sealed parapet wall



P7 Sealed eaves



P8 Southern elevation; well-sealed tiles