

TOOTING LIDO CHANGING ROOMS,
TOOTING BEC LIDO,
TOOTING BEC ROAD,
TOOTING COMMONS SW16 1RU.

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CONTROL SHEET

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Job Title. Preliminary Bat Habitat Assessment changing rooms and reception building
Tooting Bec Lido

Purpose External Use

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INTRODUCTION

Background

- 1.1 A Preliminary Bat Habitat Assessment was commissioned, to investigate the potential for protected species at the changing rooms and reception building, Tooting Bec Lido, Tooting Bec Road, Tooting Common, SW16. This is to determine whether there will be any impact on bats during future works.
- 1.2 Plans exist to refurbish, or demolish and rebuild as the changing rooms are considered no longer 'fit for purpose'. I have also been asked to suggest ways in which the site can 'do more' for wildlife. This would be expected in any planning application as there is a requirement for 'Net Gain'.

Site Description

- 1.3 The changing rooms are positioned at the public entrance to the Lido, close to the public car park along Tooting Bec Road, within the complex of Tooting Commons. A memorial tree on the grass attests to the Lido opening in 1906.
- 1.4 It is thought the changing rooms date from the 1980's when a new entrance was created. The conditions for the new entrance included a number of screening trees, so that the Common would retain its open appearance. This included planting of willow.
- 1.5 Tooting Commons (82 ha) are classed as a Site of Metropolitan Importance (SMI). The habitat comprises acid grassland, secondary woodland, scrub and ponds. It is a large open space with extensive areas of woodland and acidic grassland in an area of London deficient in good wildlife sites. The woodland is dominated by oak, with a range of other trees including hornbeam and elm. It supports a good variety of woodland birds for an inner London site.
- 1.6 Non - statutory wildlife sites within 100m south-east include the Railway line sides of Streatham Junction and Tooting Bec to Eardley Road (550m to the south) which form a substantial green corridor through the area.

Aims of Assessment

- 1.1 The purpose of this assessment was to:
 - (a) Determine any potential impacts to bats, or their roosts posed by the works; and,
 - (b) Advise of mitigation measures that may be required to ensure that the proposed works proceed lawfully.

- (c) This could mean either a European Protected Species Mitigation Licence or a Bat Mitigation Method Statement depending on whether a) a bat will be disturbed or b) a roost altered or destroyed.

METHODOLOGY

Desk Study

- 2.1 Records were obtained using: London Bat Group records; and MAGIC (Multi Agency Geographic Information for the Countryside) website (<http://magic.defra.gov.uk/>).

Building Inspection

- 2.2 An inspection of the two changing rooms and reception building was undertaken during 2.6.22 accompanied by Mr B. Paton from the group managing the pool.
- 2.3 An internal and external building inspection was performed. The survey was carried out using close focussing binoculars for the roof elements, including the large vents.
- 2.4 The grassy area to the north of the site was also considered as it would be here that any beneficial measures for wildlife would be provided.
- 2.5 The survey methods were in accordance with The Bat Conservation Trust's *Bat Surveys: Good Practice Guidelines – 3rd Edition* (Collins, 2018), and *The Bat Worker's Manual* (Mitchell-Jones and McLeish, 2004).

Surveyor Information

- 2.6 The surveys were undertaken by A Fure Class 2 Bat Licence (Natural England licence number 2015-10381-CLS-CLS) full member of the Chartered Institute of Ecology and Environmental Management (CIEEM).

Limitations

- 2.7 There were no obvious limitations as the weather was good. With the exception of the south side of the female changing rooms and the internal area of the men's changing rooms the areas were easily accessible. This was not thought to be problematic as the features are repetitive and suitable mitigation for the southern elevation, was incorporated into the Recommendations.

RESULTS

Desk study

3.1 London Bat Group survey data records five bat species. Authors data records a casualty in the Lido 2010

Table 1: Status of bats recorded in the local catchment.

Species	Frequency	Main roosts sites
Common pipistrelle <i>Pipistrellus pipistrellus</i>	Common	Usually buildings Recorded during surveys / Bat walks 2007-2015 Dead Bat in the pool July 15 th 2010
Soprano pipistrelle <i>P. pygmaeus</i>	Common	Buildings and trees especially near water Recorded during bat walks as above
Noctule bat <i>N. noctula</i>	Becoming less common in London	Roosts in trees recorded during surveys on the Common
Leislars bat <i>Nyctalus leisleri</i>	Rare	Roosts in trees Local presence of this species has been recorded at Wandsworth Common 2014, Streatham and Tooting Bec Common (P. Briggs bat walks). And strong presence during 2016 surveys
Serotine bat <i>Eptesicus serotinus</i>	Rarer in London	Recorded during Tooting Common 2016 surveys

Adapted from Mitchell-Jones (2007)

LBG=London Bat Group records authors data

Building Inspection

Internal

3.2 The internal inspection found a total lack of evidence of animal ingress. There were no internal voids in either changing room. The male changing room was not entered. The reception building was occupied by staff and not entered.

Table 2. Photographs: Internal views



Photo 1: Female changing rooms, no roof void.



Photo 2: Good view of the roof material and vent.

Building inspection: external

- 3.3 There were no signs of bat ingress. The building was clean and most areas were inspected with the exception of the southern elevation of the female changing rooms. This was not thought to be problematic as the buildings did not exhibit any features that might be attractive to bats.
- 3.4 That is not to say there was no access, as there were gaps, as can be seen in the 'folds' of the corrugated roof (photo 3). But these were not optimised for bat use due to a fluctuating temperature, including the assumed profound heat generated. There was no evidence of bat droppings on the fascia beneath.

Table 3. Photographs: external view



Photo 3: Corrugated sheeting: the pleats or folds form accessible voids



Photo 4: The female changing rooms in proximity to the vegetation, exhibited an area of soffit (marked by the arrow) that could not be closely investigated.

Female changing rooms

- 3.5 All three roofs were similarly constructed. This means they had corrugated roof sheeting with pleats at the roofline, which formed a gap or void. Beneath this was a large soffit box around the changing rooms. This was investigated for animal droppings, although none were found.
- 3.6 The female changing rooms were not entirely visible on the south side and there was a close connection with the south side and the woodland Photo 4.
- 3.7 Beneath the soffits were Crittall - type windows, covered in louvres. There were no gaps within this construction. The windows were set above opaque glass units, raised on rendered block work (extending to 1.5m in height) which had a ledge between the two features, acting as a sill. This did not exhibit any deposits from flying animals.
- 3.8 The male changing rooms had no contact with the woodland but was similar in every other way. The building was not entered. The changing rooms had no bat potential.

Reception building

- 3.9 The reception building was styled in the same way only was boat shaped with no glass tiles and windows from which the reception was operated. The roof had no vent and there were no eaves/soffits. There was no connection to vegetation. It had no bat potential.

Trees

- 3.10 There were no trees which would be impacted by demolition of the buildings provided reasonable care was undertaken and British Standard 5837 pertaining to trees was followed. There was an ash at the entrance to the Lido, which already had a number of wounds to the bole.

Additional comments

- 3.11 The grassland was inspected for Net Gain opportunities and the following were noted. There was an area to the south-east of the grass that was enclosed by HERAS fencing and had become scrubby. This was developing into blackthorn scrub which is important for butterflies.
- 3.12 In the north-east corner was an important veteran oak which presented cavities that would be of interest to roosting bats. It was in amenity grass that had been cut to reveal the bare earth which is not good for a tree of this age which requires stability of resources.
- 3.13 The northern boundary grass along the back fence exhibited a range of plants, including black knapweed. A Table of the plants is appended, note the grass had been recently cut short. The grassland showed signs of frequent and recent waterlogging.

ASSESSMENT

Discussion of Findings

- 4.1 The building inspection found that the roof had no gaps that could have facilitated bat access. No bat droppings or staining were found at these positions when viewed through binoculars. Nor were droppings seen at any of the areas that could have 'contained' droppings such as the sills or cobwebs as is sometimes the case with flying animals.
- 4.2 It must be stated that there were gaps in the pleats within the corrugated sheets, but these were not optimised for bats. That is not to say that bats do not use steel buildings, as they frequently roost in expansion joints in steel framed buildings, but only where the temperature fluctuations would be minimal. This roof would be greater than a living organism could bear in the midday sun.
- 4.3 The soffit around the female changing rooms requires additional comment. This could not be seen satisfactorily using binoculars; it was not possible to climb up to the area for a more complete view.
- 4.4 Prior to demolition then further intervention may be required according to the time of year and completed proposal which will be addressed in the recommendations. It is always the best time to begin works in situations where there is a low potential for bats such as the autumn.

Potential Impacts of works

- 4.5 In the unlikely event of there being disturbance of a bat roosting casually, mitigation is proposed in the recommendation table.
- 4.6 All species of bat found in Britain, and their roosts, receive protection under Schedule 2 of the Conservation of Habitats and Species Regulations 2010 (as amended) and Schedule 5 of the Wildlife and Countryside Act 1981 (as amended). These legislative tools make it an offence for any person to:
- Deliberately **capture, injure, or kill a bat**;
 - Intentionally or recklessly **destroy a breeding or resting place (roost) of a bat**; and,
 - Intentionally or recklessly **obstruct access for bats to a roost** or to alter the structure of a roost otherwise significantly to render it unsuitable to support roosting bats.

Net Gain

- 4.7 The National Planning Policy Framework (NPPF), Department of Communities and Local Government Feb 2019 requires local authorities to avoid and minimise impacts on biodiversity when taking planning decisions. Guidance requires ‘wider benefits from Natural Capital and Ecosystem services’, ‘secure measurable Net Gains for biodiversity (paras 174b 175 d) including ‘by establishing coherent ecological networks that are more resilient to current and future pressure’.
- 4.8 The Natural Environment and Rural Communities Act (NERC) Act 2006 (S41) requires the state to consider habitats and species, which are of principal importance for the conservation of biodiversity in England. This list relates to the Priority Biodiversity Action Plan (BAP) Species and Habitats as listed 2007 (revised 2008) including habitat features such as broadleaved woodland as well as species such as great crested newts, slow worms and hedgehogs.

National Planning Policy Framework 2019

- 4.9 a) Identify, map and safeguard components of wildlife rich habitats and wider ecological networks, wildlife corridors and stepping stones that connect them; and areas identified by local partnerships for habitat management, restoration or creation; and
- 4.10 b) Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

Biodiversity Action Plans

- 4.11 The Government’s 25 Year Environment Plan includes provision for a Nature Recovery Network (NRN) and states that it will deliver on the recommendations of the Lawton Report 2010 and that recovering wildlife will require more habitat; in better condition; in bigger patches that are more closely connected. As well as helping wildlife thrive, the NRN could be designed to bring a wide range of additional benefits: greater public enjoyment; pollination; carbon capture; water quality improvements and flood management.
- 4.12 Natural England have produced a series of habitat network maps that will help address the challenges outlined in the Lawton report 2010 providing a baseline for the development of a NRN as required within the 25 Year Environment Plan and Local Nature Recovery Strategies as proposed within the forthcoming Environment Bill. Many planning authorities are adopting these strategies early, depending on the status of their Local Plan.

- 4.13 Net Gain must be tangible and by next year will be measurable using a metric. Managing the grassland for biodiversity provides an opportunity for Net Gain as well as for better management of the standing water on the site.
- 4.14 The grass near the northern boundary of the site contains a wealth of meadow flowers and for this reason the ultimate 2m should be mowed once annually. This should incorporate the root protection area of the veteran oak tree. A scalloped edge to the mini-meadow is even better for small creatures.
- 4.15 The area within the HERAS fence on site should also be maximised for biodiversity and some of the old machinery removed. Longer grass will increase transpiration of water and may improve the impact of the standing water on the grass.

RECOMMENDATIONS

Mitigation

- 4.16 Mitigation measures to avoid direct impacts to bats as well as features with potential to support roosting bats are provided in table below.


Table 4	
Area of works	Summary Mitigation
Soffit box female changing rooms	<p>Soft stripping of the soffit on the female changing rooms should be implemented. This is because the southern side could not be viewed during the inspection and the Desk Study returns.</p> <p>If droppings (see below) are found in any areas, then work must be halted and advice sought to acquire a European Protected Species licence.</p>
Bat droppings	
Tyvek	Tyvek breathable membranes should not be used in any new roofs. They cause bat entanglement and slow death. Bitumen 1FF felt should be used or alternative.
Lighting	<p>Any new lighting proposed should:</p> <ol style="list-style-type: none"> 1. Trigger a bat survey to ascertain whether a roost is present in the trees. This is due to the casualty found in the pool during the desk study. 2. Take account of the recommendations on the Bat Conservation Trust website. They should be low level, have horizontal cut offs and be on PIR sensors set to less than 3 minutes. Warm temperature lighting is preferred.

Table 4	
Area of works	Summary Mitigation
Net Gain	Two meters from the northern boundary should be incorporated into a relaxed mowing regime. This should include the root protection area of the veteran oak and the area within the HERAS fence.

If bats are encountered during the proposed works then all works must cease immediately and a licensed bat ecologist must be called to site. In this event, works may not recommence until the ecologist has consulted Natural England and agreed a suitable and lawful way to proceed.

REFERENCES

Authors Data 2012-2018

HMSO (2006) Natural Environment and Rural Communities Act 2006. HMSO, London.

HMSO (2010) Conservation of Habitats and Species Regulations 2010. HMSO,

London Bat Group data 2022

Collins, J., Ed. (2018) Bat Surveys, Good Practice Guidelines. Bat Conservation Trust, London.

DEFRA website Magic <http://www.magic.gov.uk> designations and EPSM licences

APPENDIX

Table 5 Characteristic plants of the amenity area on site

Scientific name	English Name
<i>Anthriscus sylvestris</i>	Cow Parsley
<i>Bellis perennis</i>	Daisy
<i>Centaurea nigra</i>	Common Knapweed
<i>Lapsana communis</i>	Nipplewort
<i>Plantago major</i>	Greater Plantain
<i>Poa annua</i>	Annual Meadow-grass
<i>Prunus spinosa</i>	Blackthorn
<i>Quercus robur</i>	Pedunculate Oak
<i>Ranunculus bulbosus</i>	Bulbous Buttercup
<i>Spergularia rubra</i>	Sand Spurrey outside Lido
<i>Tilia x europaea</i>	Lime
<i>Trifolium campestre</i>	Hop Trefoil