

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	242910
Address:	East Court, Jubilee Road, Finchampstead, Wokingham, RG40 3SD.		
Proposal:	Application for submission of details to comply with the following condition of listed building consent 233044 dated 08/02/2024. Condition 4 relates to details of the roof.		
Type of Development:			
Site Visit Made:	No		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☒ Request further information before determination as **stated below**
- ☐ Objection due to the reason(s) **stated below**

Comments On Proposal

During the preliminary roost assessment evidence of bats was found within each of the loft voids. Several entry points to the main property were noted, including raised roof tiles, decaying bargeboards, and other gaps at connecting points. Roost 1 and roost 3 are used by a maternity colony of Brown long-eared bats. The majority of the other roost access features are day roosts for individual bats. These roost access points are used by four bat species (soprano pipistrelle, common pipistrelle, brown long-eared bat and Natterer's bat). The maximum number of bats using the farmhouse and stable complex counted to emerge on one survey was 32. Roost 4 was used on one occasion by a Natterer's bat. Due to the complexity of the roof on the farmhouse there are areas which neither a camera nor a surveyor could adequately observe. During 2024 update survey four new roosts were identified, including one small maternity roost for common pipistrelle bats. With this information there are now 36 roost access points equating to 24 roosts.

According to section 4.4.3 of the EUROBATS Publication Series No. 11 Guidelines for bats, insulation and lining materials sheep's wool insulation threatens bats by entanglement. The wool strands become loose and become tangled around a bat's feet and wings, resulting in bats becoming immobilised and eventually dying. This guidance states that the roof void should be inspected by a suitably qualified ecologist prior to works taking place, to ensure no access points are blocked and no bats are around when the work is being done. Sheep's wool could be packaged

loosely in some sort of pillowcase to stop the spreading at the eaves and the bats coming into contact with this. Disturbance to the roost should be avoided by working when bats are not present, and any wool should be covered by fabric with entrances and exits remaining clear of material to retain access. No material should block roosting areas at roof apex or on roof surface; these should be retained or reinstated with the addition of rough wooden boards. CIEEM UK Bat Mitigation Guidelines 2023 advises that in all circumstances where a roof void is retained, enhanced or created with the aim of providing a roost space for bats, a range of microclimates should be included within that void. A check, using temperature loggers, should be made that at least one (and preferably more) areas are within the broad temperature preferences of the species concerned.

I'm satisfied that the covering letter (Andy Paterson Architects ref 2203/L/03, 18 November 2024) refers to wood treatment of existing roof timbers being listed as one that is safe for use in or near bat roosts, and specification of the handmade clay roof tiles to replace existing to be Keymer tiles. However, the letter does not demonstrate that the Ecologist has agreed to use of sheep wool insulation. Nor that the Treatment of Gables of the replacement of all vertical hung tiles on gables ends, addition of 60mm thick wood fibre insulation board with counter battens and over parging coat 6-8mm thick over existing solid brick walls has been approved by Natural England in the mitigation strategy when the site was registered for Earned Recognition Class Licence.

The Potential Mitigation section of the Final Bat Survey Report (Spires Ecology, October 2023) and the 2024 Final Bat Survey Report subsequently provided to the LPA in connection with application 242350, state that the works to BLE maternity roosts should commence from September/October when the roost has dispersed, or, less ideally, March/April prior to a maternity roost forming for the following year.

The mitigation proposals state it will be necessary to ensure access for bats remains beneath hanging tiles, roof tiles and ridge tiles and that there is still access into loft voids (1 and 2) on the building after works are completed. Natterer's, common and soprano pipistrelle bats are predominantly crevice-roosting bats, whilst brown long-eared bats require large, open loft voids. To ensure access remains for bats, the hanging tiles, roof and ridge tiles in the areas marked by roost access points should be slightly raised, or alternatively have bespoke bat tiles used in these areas to ensure access remains post-works. Long-eared bats may require cuts in the F1 bitumastic felt lining to ensure they can access loft 1 and loft 2.

I would not currently recommend approving submissions Eaves – Existing (Andy Paterson Architects Dwg 2203 A 50), Eaves – Proposed (Dwg 2203 A 51), and Verge - Existing & Proposed (Dwg 2203 A 52) and the covering letter sections on treatment of gables, insulation, treatment of eaves, verges and ridges and means of ventilating the roof unless confirmation is provided that the Ecologist named on the earned recognition licence has approved the materials and details of treatments and the access points missing the drawings have been included in the proposals. None of the cross section proposed drawings show the bat access gaps or tiles. I note that the new tiles on the verges shown in Dwg 2203 A 52, are to be nailed on which is not a like-for-like replacement as proposed.

The Potential Mitigation did not assess the impact on temperature and humidity of the detail of the roof replacement proposals and in the absence of more information and assessment by the Ecologist the submissions do not demonstrate that the treatments are acceptable and consistent with the EPS Licence mitigation strategy. I therefore request an assessment of the proposals and that details of the access tiles that are proposed, access points to be created between a soffit and the wall, any adapted bricks and tiles, gaps in masonry or raised lead flashing, mortar gaps under ridge tiles and at the ridge end, as well as gaps or access tiles in the ventilation are submitted. Details of monitoring of temperature and humidity which will be installed should also be provided.

The 2024 Final Bat Survey Report refers to a proposed change of tiles in one section of roof changing from clay to slate tiles. While the Ecologist has assessed this will not impact the overall provision for bat roosting, commercially available bat access slate tile on this roof section will ensure bats still utilise this pitch for roosting. I note the submitted details of the roof and the materials proposed in the application form do not include slate or the necessary bat access tiles.

The Ecologist noted that BLE bats can remain in their summer roost into the winter hibernation period, and therefore all destructive work to pertinent areas should occur within the autumn or spring windows, to reduce the impacts of disturbance on any individual bats. A licence cannot be issued less than three weeks or more than 12 weeks in advance of works commencing. I therefore request that proof of site registration for the entire property under Licensing Policy 4 Earned Recognition Class Licence is provided to the LPA before works commence in March/April. This will ensure the timing of works that would impact the BLE maternity roost in lofts 1 and 2 in particular is consistent with the Final Bat Survey Report proposals. Bats are highly mobile and can switch roost access features and roost locations to areas where they have previously not been found. As proposed, the licenced ecologist or their representative **must be** on site to supervise the soft-strip of every roof, ridge tiles and hanging tiles to ensure that any bats located can be removed therefore to safeguard bats which may be on site when work commences in March or September.

It will be a condition of the licence that monitoring of the roosts and bat activity on site is undertaken at least one year after work to the bat roost is completed. I therefore request that the applicant submits annually to the LPA copies of the Ecologist's monitoring reports.

Bats are subject to disturbance from changes or increases in light levels in areas upon which they rely, including roost access points, commuting routes and foraging areas. The Final Bat Survey Report proposes that suitable lighting for bats which also ensure required visibility for occupants include directional down-lighting, illuminating below the horizontal plane to avoid light spill into the surrounding area. They advise low level path lighting should be considered, using narrow spectrum low ultra-violet warm LED lighting which is triggered via motion sensors. I note no lighting scheme or external lighting proposals have been currently submitted to and approved the LPA as part of a Listed Building application.

Summary

In the absence of the detail of the access tiles, gaps, specialist slates and ridge tiles the submissions do not demonstrate that the tiles will be replaced on a like-for-like basis, and that there will be numerous cavities available for bat roosting under tiles on the new roofs. Assessment of the impact of the treatments and materials on temperature is also needed to show that the number of roost and conditions will have no detrimental no impact on the favourable conservation status of any species. I do not recommend discharging the condition until more information has been received from the ecologist.

Conditions & Reasons (if required)

Awaiting confirmation that Dwg 2203 A 50, 51 and 52 have been agreed by Natural England and the Ecologist and provision of detail of the bat roost access points and potential roosting features for crevice dwelling bats to ensure the favourable conservation status of all bat species on site is maintained and wildlife is enhanced.

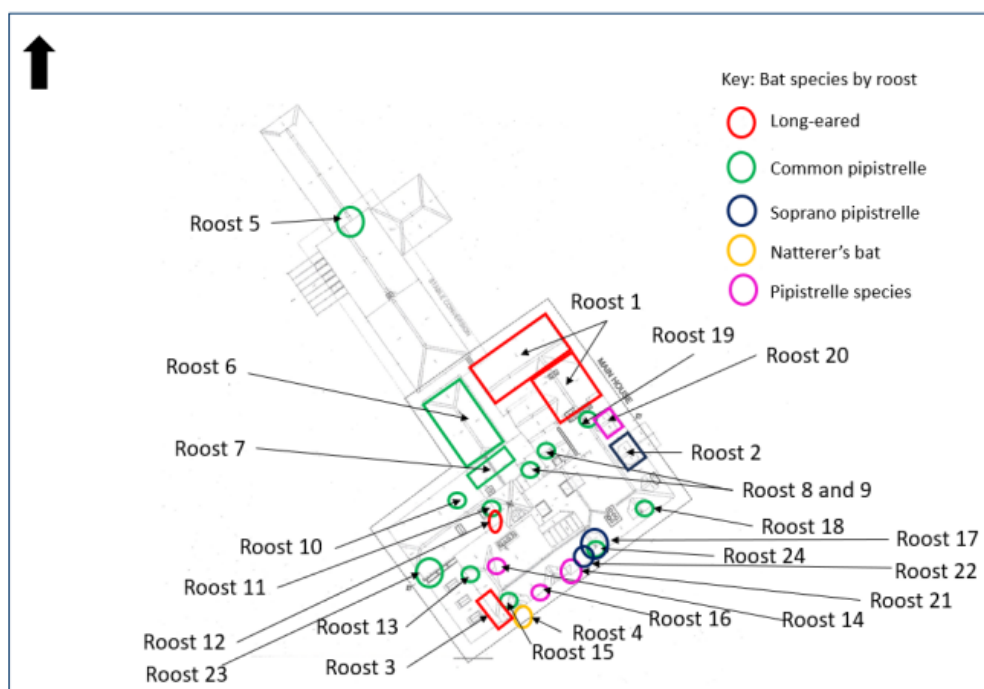
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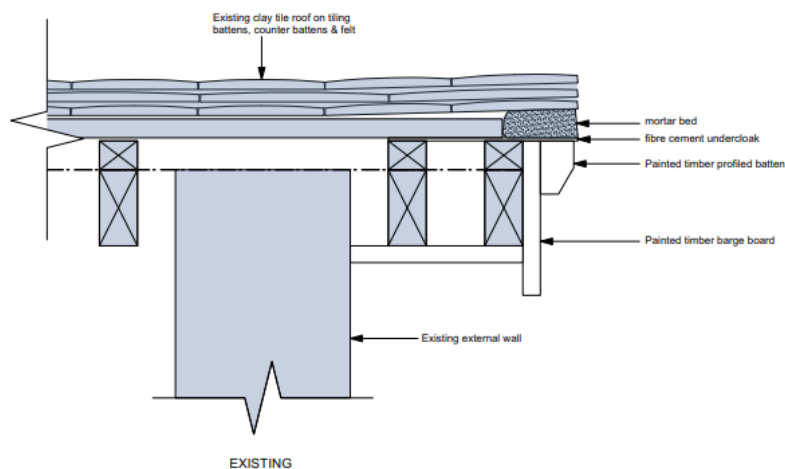
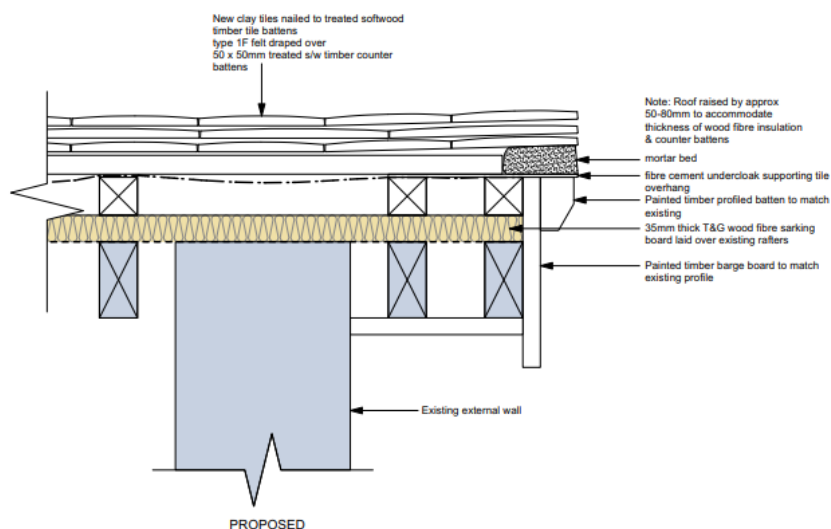
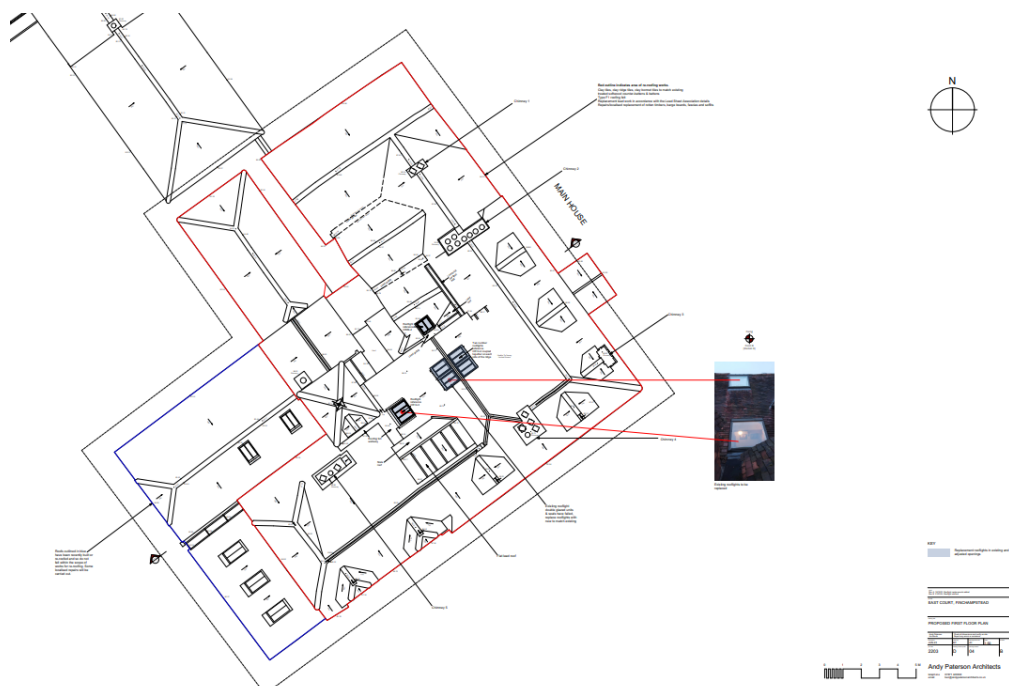
9/1/25

Signed:

T Cuss

Figure 4: Approximate locations of roosts



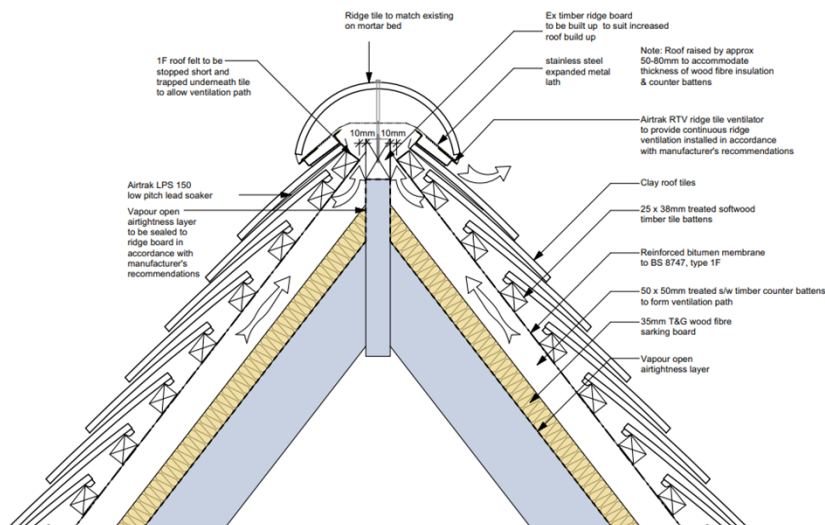


**EAST COURT, FINCHAMPSTEAD
REROOFING WORKS**

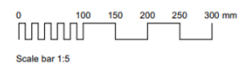
VERGE - EXISTING & PROPOSED

Andy Paterson Architects	Check all dimensions and verify on site. Report any errors or omissions.		
NOV 24	BT	A3	1:5
2203	A	52	

Andy Paterson Architects

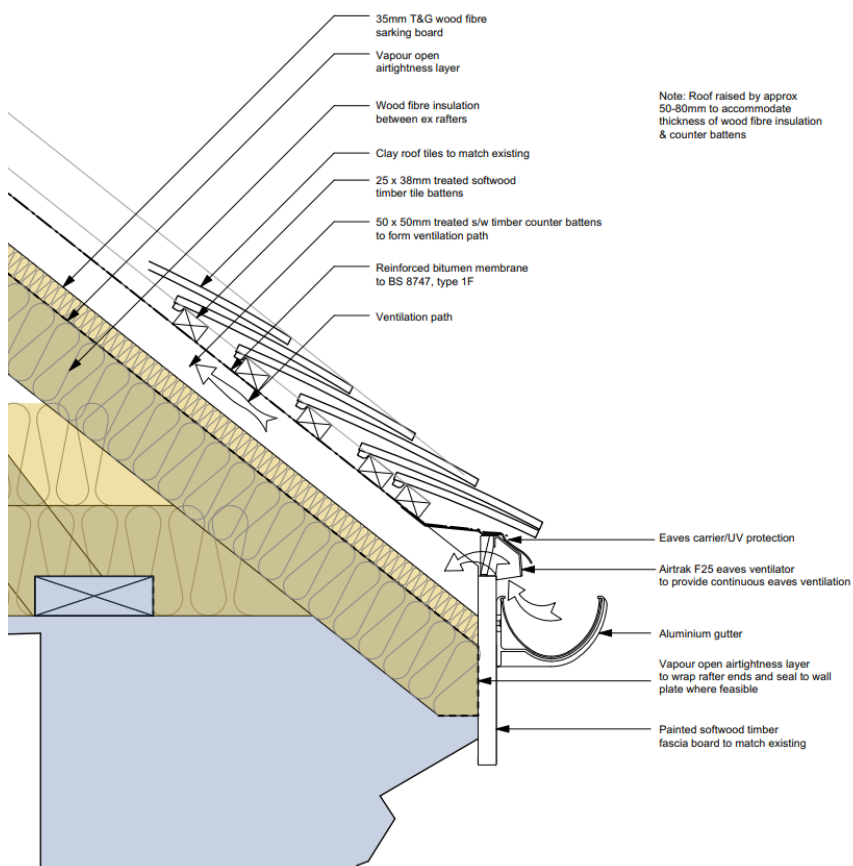


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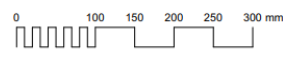
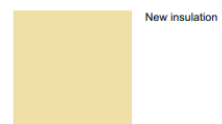
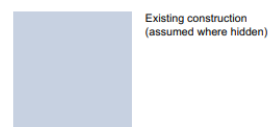


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RIDGE - PROPOSED



KEY



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EAVES - PROPOSED