

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260214
Address:	Hatchgate End, Hatch Gate Lane, Cockpole Green, Wargrave, RG10 8NE.		
Proposal:	Application for submission of details to comply with the following condition of planning consent 251318 dated 08/09/2025. Condition 3. External Materials. 5. Landscaping. 6. Drainage. 7. External Lighting.		
Type of Development:			
Site Visit Made:	No		

Summary Of Recommendations

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

Comments On Proposal

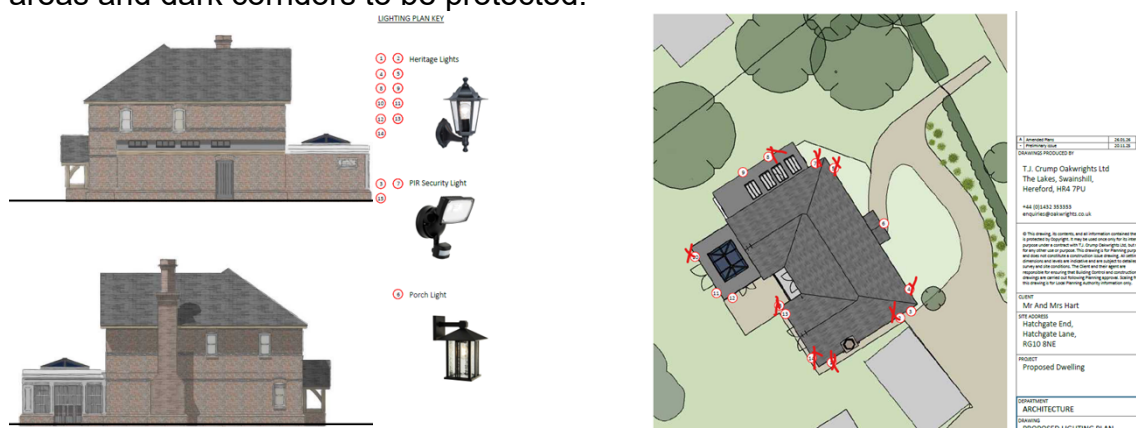
I have reviewed the Sustainable Drainage Assessment, Landscaping Plan (Oakwrights, 2748.21 Rev B 14 January 2026) and Proposed Lighting Plan (Oakwrights, 27.48.1.2 -HAR-20 Rev A, 26 January 2026).

A replacement single tree, and no hedgerow planting, or native trees or shrubs are proposed and no stock sizes, spacing or timings is specified. The Landscaping Plan fails to provide any gapping up on the northwestern boundary and provision of a continuous wildlife corridor to compensate habitat clearance and loss and ensure habitat for bats and other wildlife is maintained and enhanced.

According to the Bat Emergence and Re-Entry Surveys (BERS) (Arbtech, 13 June 2024), the new development will not involve significant changes in lighting. The Ecologist stated that the Bat Mitigation Class Licence would include “*avoiding the use of unnecessary lighting, or implementation a low impact lighting strategy to avoid illumination of retained or newly created roosts or roost features*”. I note Brown long-eared bats are particularly sensitive to light pollution.

The scheme of lighting Heritage Lights and Security Lights inset images shown in the Proposed Lighting Plan Rev A are not directional angled below the horizontal,

and fail protect dark corridors, particularly along the northwestern boundary. The scheme does not justify or demonstrate the need for any external lighting on the northern and southern elevations. The lighting strategy does not identify sensitive areas and dark corridors to be protected.



To fulfil Condition 7 the biodiversity sensitive scheme must:

- identify those areas/features on site that are particularly sensitive for bat, birds and amphibians; and
- show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or impact the above species.

To support a revised wildlife and bat-sensitive lighting scheme the following changes need to be made in line with best practice including GC08/23:

- Identify areas/features sensitive for birds and bats.
- Luminaires 1,2,4,5, 10 and 14 on corners and elevations without requirement for outside access to be omitted.
- Amending Heritage Lights for downlights with limited lightspill which do not reflect upward and on to buildings or boundary foraging corridors. Detail of PIR controls.
- Omission unnecessary security light 7 and 15.
- Technical specification of luminaire 3 to be angled directed and angled at the horizontal.
- Technical specification including lux, lightspread, temperature/wavelength of luminaires and detail PIR circuits and controls of remaining wall and low watt security light 1 5.
- Provision of lighting contour plans.

I note according to the Sustainable Drainage Assessment, trenches were left uncovered, vegetation was not strimmed, and spoil piles were not stored in accordance with the GCN method statement.

Conditions & Reasons (if required)

I recommend that the external lighting scheme is not approved and must be amended in accordance with best practice Bats and Artificial Lighting at Night GN08/23 and the requirements of condition 7.

Date:	02/02/26	Signed:	T Cuss
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