

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260582
Address:	Manor Cottage, Barkham Street, Barkham, Wokingham, RG40 4PJ.		
Proposal:	Householder application for proposed erection of front porch extension, 2 storey side and part 2 storey/single storey rear extension and addition of new site entrance with new front gates alongside walls and railings.		
Type of Development:	Other Householder		
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

I have read the Ecological Survey Report (Urban Tree Experts, Ref SPH/ESR-25/29.06, 23 July 2025) and Preliminary Roost Assessment (Arbtech 16 April 2024). I have also reviewed the plans and elevations submitted in support of the application.

All bat species are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as amended. Under this legislation it is an offence to deliberately or recklessly to destroy or damage their roosts, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from Natural England. A bat roost is interpreted as "*any structure or place used for shelter or protection*" whether or not bats are present at the time.

The Preliminary Roost Assessment undertaken in April 2024 recorded bat dropping scattered below the ridge beam throughout both sections of the loft. The bat droppings appeared to "*be a mixture of ages indicating repetitive use of the roost*". They advised that light seen entering the loft at the base of the roof could be used as an access point into the loft.

Appendix 1: PRA plan



The UTE Ecological Survey Report (ESR) does not state that an ecologist repeated or updated the internal inspection in 2025. I can't agree therefore currently agree that the bat roost in the loft space is historic and that there *"were no fresh droppings"*. Arbtech state only that the chimney brickworks was in good condition and soffits in excellent condition in 2024. I disagree with the inference that *"Externally and internally the property was found to be in a good condition"*. UTE do not report the section of loft clad in bitumen felt has some gaps in places which Arbtech assessed may provide internal roosting sites for bats. Arbtech state *"bats can roost between the lining and the roof tiles, or within pockets created by sagging roofing felt. Light could be seen entering the loft at the base of the roof which could be used as an access point into the loft"*

I am satisfied that emergence surveys were carried out 11 May, 4 June and 29 June were in accordance with best practice and that no or bats emerged or re-entered the property to roost. UTE' ecologist concluded that the gaps in the roof tiles and missing mortar provided potential roosting opportunities for crevice dwelling bat species such as pipistrelle sp. and BLE bat. EST 5.5.1 states planning policy requires enhancements leading to a biodiversity gain, and integral bat boxes in the soffits at eaves level, or between the joists and combined with bat access tiles positioned on south, east or west facing elevations but not directly above a window could be provided in the extension. They advise suitable alternatives would include bat access tiles at the ridge and providing access to the roof void but only that Non-Bitumen Coated Roofing Membranes (NBCRM) that has passed the snagging propensity test should be used to prevent illegal entangle bats.

Local Plan policy CP3 states, planning permission will be granted for proposals that

d) maintain or enhance the ability of the site to support fauna and flora including protected species. Development proposals will be required to demonstrate how they have responded through the submission of clear and informative plans, elevation and streetscenes. Local Plan policy CP7 states development which may harm habitats or, species of principle importance or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly, will be only permitted if appropriate compensation measures to offset the scale and kind of losses are provided.

I agree the Method Statement for Planning is needed, and conditions securing implementation in strict accordance with the avoidance and mitigation measures recommended or proposed by UTE include must be imposed. The measures must include:

- Further survey effort is required if there is a delay of greater than one year (ie after 24 July 2026).
- Works with the potential to disturb bats (eg removing roof and ridge tiles) only to be undertake during the period (1 May to 31 August).
- a toolbox talk given to all contractors prior to commencement of works by a retained Project Ecologist.
- All new external lighting will follow Bats and Artificial Lighting At Night Guidance Note GN08/23 (Bat Conservation Trust and Institution for Lighting Professionals) best practice must be followed.
- Incorporation of bat roosting to mitigate bat roost loss.

While I support the recommendations in ESR Section 5.5, no compensation or enhancements are shown on the Proposed Elevation Dwg NL002A. The ESR and submissions do not include clear proposals that have been agreed with the applicant. As DNA analysis has not been carried out as advised by Arbtech, the precautionary approach is to assume the scattered bat dropping below the ridge came from Brown long-eared bats, and proportion of loft void should be retained or a replaced provided in the extension to ensure maintenance of the void and crevice-dwelling bat populations. Details of the proposed bat loft and integral bat tubes/bricks proposed must be submitted and approved prior to commencement to compensate the loss of potential roosting features and the impact to the voids.

UTE have failed to include the Swift brick enhancement recommended by Arbtech. I therefore request that the Swift bricks, the Universal Nest Brick for small bird species, and all the mitigation and enhancements on page PRA 7 are secured by condition to comply with NPPF 187 and WBC policies. Two integrated swift bricks (e.g. Ibstock Swift Eco Habitat or similar alternative brand) must be integrated in to the building, close together, at least 5m above ground level under the eaves north or east elevation in line with the measures outlined in the BS 42021:2022 Integral nest boxes.

As stated by the Ecologist it is essential that any new external lighting is carefully selected, for example, all external lighting must be warm white LED and directed downward and be located at a low level. By carefully directing light downwards and using a PIR with short illumination sensor the impact of external lighting on any foraging bats can be reduced. In order to address the negative impact of the existing flood lighting and potential reckless obstruction of the bat roost and deterring bats

using the features and access gaps recorded in 2024 a bat-sensitive lighting scheme that includes removal of existing sources of light pollution should be secured in order to maintain and enhance bat population on the site.



BS42020 Code of practice for planning and development paragraph 6.4.8 states “where relevant, any report on survey activities should also include reference to any evidence of material events occurring on site, either before or after ecological surveys have been carried out, for example:

a) removal or management of vegetation, including trees;

b) alteration or loss of other biodiversity features, such as hedgerows, ponds, ditches or buildings and features of value to protected species;...

Such events should be described and the cause explained where known along with the implications, if any, for the main findings of the ecological report”.

Arbtech describe the large garden contained scattered trees, shrubs and hedgerows which provide foraging and commuting opportunities for bat. They assessed further large trees on neighbouring properties and patches of woodland are all likely provide foraging and commuting opportunities for bats. According to my assessment of Streetview photos, the Arbtech’s description does not match the current degraded condition of the site.

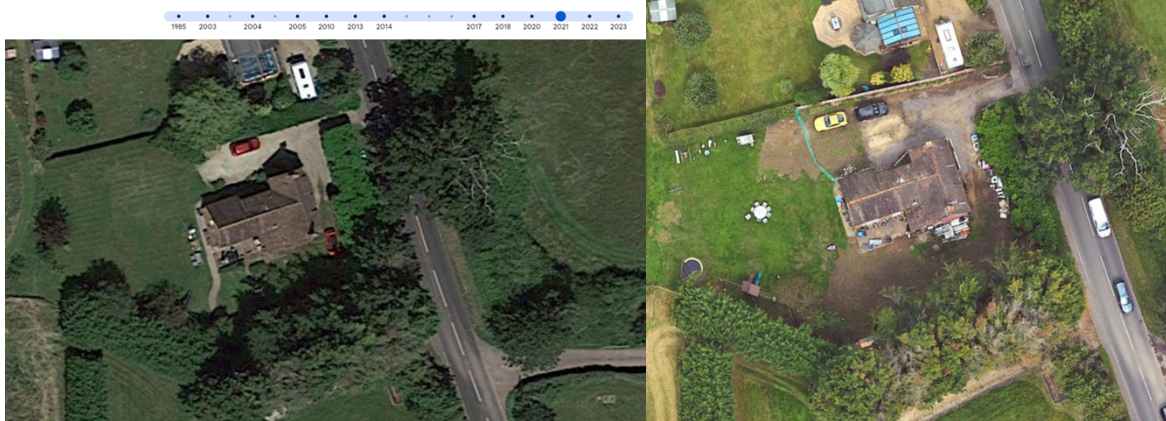


Photo 3: Looking south along the boundary of the site showing the tree line which will provide foraging and commuting habitat.

I disagree with the application form, that work including, in particular the construction of the gravel car park and surfacing of the front garden, removal of hedgerows and erection of boundary fences, infilling of the Highway ditch to create and new access have not started. Neither the application form, ESR nor PRA assesses the effects of the grass, shrub and northern hedgerow clearance on bats and other wildlife and the loss of biodiversity habitat contrary to planning policy.

ESR-25/29.06 does not address the loss or negative impacts to interconnected tree lines and hedgerows along field boundaries that created a network of commuting routes for bats, connecting to the surrounding area. Clarification must be provided whether southern and eastern boundary hedges were cleared before the emergence surveys commenced or the ESR failed to assess the changes in the on and off-site commuting corridors and consider whether this impacted bat commuting and

whether the roost was occupied in 2025.



According to MDD policy TB23, planning permission will only be granted where they comply with policy CP7 and also demonstrate how they provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing and provide appropriate buffer zones between development and species of principle importance. Development must ensure that all developments are ecologically permeable through the protection of existing and the provision of new wildlife corridors. In accordance with the NPPF and WBC Planning Policy to maintain breeding birds and bat foraging, commuting and roosting a landscaping scheme securing compensation boundary hedgerow planting to maintain corridors should be secured by condition if the application is approved.

ESR-25/29.06 states that the full details of which are unknown at the time of writing. Neither Ecological Consultant has therefore considered the detail of the development plans, tree felling, car park construction and construction of a new 2nd southern access, and assess the details of impact of the proposal on wildlife and biodiversity habitat. The ESR has not assessed the impact of the loss of foraging habitat on the north and east sides or proposed compensation in line with the NPPR and local plan policy. Details of the features and habitats which supported foraging and commuting of bats from the roost and in the vicinity should be provided in order for the cumulative direct and indirect impact on protected species to be considered and adequate compensation secured to maintain favourable conservation status.

The application does not justify the need for an additional Highway access, infilling of the ditch and loss of highway verge and hedgerow habitat as required by Local Plan policy. I request the works to the public Highway are reconsidered and replacement tree and native broadleaved hedgerow planting are proposed in order to recreate and compensate for the loss of north-south and east-west treelines and bat foraging and commuting routes impacted.

According to UTE the ESR ceases to be valid one year from the survey (June 2025) or if the site conditions change due to unspecified works, whichever is the sooner. Due to the changes that have taken place since completion of the PRA, the increased scale of the development and because the last emergence survey was completed in late June 2025 in accordance with BS42020 condition D.5.2, further inspections and surveys and an update bat mitigation Method Statement must be secured by condition if development does not commence in before 25 July 2026.



Conditions & Reasons (if required)

Awaiting revisions of drawings Proposed Elevations NL002A to demonstrate retention or replacement of bat void roost.

Condition: Works are to be carried out in full accordance with the mitigation strategy and biodiversity enhancements given in both Section 5 Method Statement for

Planning of the submitted Ecological Survey Report and with all the biodiversity enhancements given in page 7 of the Preliminary Roost Assessment (Arbtech, 16 April 2024).

Within one month of substantial completion of any extension, a short closing-out report demonstrating that all the ecological mitigation and enhancement measures have been implemented to the satisfaction of the Owner's Ecologist must be issued to the council.

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 Section 15 Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: If development hereby approved does not commence within 6 months of the date of the planning consent, the approved bat mitigation avoidance measures given in section 5 of the Ecological Survey Report (UTE, SPH/ESR-25/29.06, 23 July 2025) shall be reviewed and, where necessary, amended and updated. The review shall be informed by further ecological surveys commissioned to

- i) establish if there have been any changes in the presence and/or abundance of bats and nesting birds; and
- ii) identify any likely new ecological impacts that might arise from any changes. Where the survey results indicate that changes have occurred that will result in ecological impacts not previously addressed in the approved scheme, the original approved ecological measures will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the local planning authority prior to the commencement of development. Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.

Should conditions at the site for bats change, or as result of the update bat survey and inspections, the project ecologist concludes that a licence for development works affecting bats is required, prior to commencement of development a licence issued by Natural England authorizing the development to go ahead, or written statement to the effect that Natural England does not consider that the specified activity/development will require a licence, have been submitted to the council.

Thereafter mitigations measures detailed in the licence shall be maintained in accordance with the approved details.

Reason: The property supports a confirmed bat roost. To ensure that protected and priority species are not adversely affected by the proposals. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Prior to commencement of development, an external lighting design strategy for biodiversity for designed in accordance with best practice including in accordance with [Bats and Artificial Lighting at Night' Guidance Note GN 08 / 23](#) shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for bats and birds and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

b) 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 prevent the above species using their territory or having access to their breeding sites and resting places.

Reason To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 198 Section 15 Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23

Date:

23/05/26

Signed:

T Cuss