

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251533
Address:	Springfields, Hatch Gate Lane, Wargrave, Wokingham, RG10 8QD.		
Proposal:	Application for submission of details to comply with the following condition of planning consent 241686 dated 04.09.2024. Condition 5 relates to bat licence.		
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

I am concerned that the Work Schedule WML-A13a-E5a&b and submitted figures have omitted the Post construction mitigation/compensation roost features and access gaps which were proposed to be included in the European Protected Species Licence.

In order to recommend discharge of condition 5 I request evidence or written confirmation from the Ecologist that both bat-adapted access roof tiles and integrated bat tubes and cladding are to be installed on completion of the roofing and construction works.

Conditions & Reasons (if required)

Awaiting confirmation bat roost compensation is being installed a proposed (see overleaf)

Date:	09/07/25	Signed:	T Cuss
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An EPSL application to Natural England will be required to legally permit the proposed works. The EPSL application requires that surveys be undertaken within the most recent active bat season (optimal May to August, suboptimal September). Planning permission must have been granted and all relevant wildlife-related conditions have been discharged prior to submission, where possible to do so. The survey effort should include at least one survey between May and June when the detection rate of bat roosts is highest.

A Material Changes Check will be required within three months of the EPSL submission, if no survey work has been undertaken within that period.

The EPSL will detail any mitigation and compensation measures that will be required for the proposed development to comply with the standing advice and will be designed to reduce any impacts to an acceptably low level so as to maintain (or enhance) the Favourable Conservation Status (FCS) of the local bat population.

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The EPSL will include the following measures:

- Timing of works to avoid the maternity season (May to September)
- Where possible, destructive works should be timed to take place in the 'shoulder' seasons October-November or March-April.
- The installation of 3 bat boxes at the site (one bat box per bat species) prior to works commencing to form a receptor site for any bats found during the works. These boxes may be installed on buildings or trees or can be pole mounted but must be in an undisturbed location and will need to be maintained in this location post-development. Bat boxes should be positioned 3-5m above ground level facing in a south or south-westerly direction with a clear flight path to and from the entrance, away from artificial light.
- The provision of a toolbox talk to contractors, by the Named Ecologist or an Accredited Agent, to inform them of the presence of bat roosts.
- A pre-commencement inspection of any roost features by the Named Ecologist or an Accredited Agent using a torch and an endoscope (this may be via ladders, scaffolding or a mobile elevated platform).
- The removal of all cladding, barge boards and the eaves by hand under the supervision of the Named Ecologist or an Accredited Agent (where it is not possible conclude absence of bats during the pre-commencement inspection).
- Avoiding the use of unnecessary lighting, particularly at night, or implementing a low impact lighting strategy to avoid illumination of retained or newly created roosts or roost features.
- Avoiding excessive noise or vibration disturbance e.g. from power tools or radios, within close proximity of retained or newly created roosts or roost features.
- Roost replacement features will be built into the new tiles and cladding in the form of integrated boxes and bat adapted tiles.

You must include a certificate that proves the roofing membrane has passed a 'snagging propensity test' if you're using a non-bitumen coated roofing membrane. A snagging propensity test checks that the membrane can stand the repeated snagging actions of roosting

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bats. To pass, a membrane must show no change in the average number of loops per cm² as rotations are increased from 0 to 1000. You do not need a certificate for bitumen 1F felt that has a non-woven, short fibre construction.

The EPSL will only include the bat species, numbers and roost types listed above. If bats are found during periods of adverse weather conditions, these must be left undisturbed until weather conditions become more favorable to move bats to the receptor bat box.

EPSLs do not allow for the disturbance of hibernating bats. Therefore, if any bats are found during the hibernation period or if any unexpected bat species or roost types are identified works must cease and advice must be sought from the Named Ecologist regarding the possible requirement for timing restrictions for works, the completion of further bat surveys or a modification to the EPSL.

Wildlife sensitive lighting strategy

A low impact lighting strategy will be adopted for the site during and post-development, which will include the following measures:

- Light spill on to the pond or the southern hedge-line should be avoided.
- Use narrow spectrum light sources to lower the range of species affected by lighting.
- Use light sources that emit minimal ultra-violet light.
- Avoid white and blue wavelengths of the light spectrum to reduce insect attraction and where white light sources are required in order to manage the blue shortwave length content they should be of a warm / neutral colour temperature <4,200 kelvin.
- Not use bare bulbs and any light pointing upwards. The spread of light will be kept in line with or below the horizontal.
- Light spill will be reduced via the use of low-level lighting used in conjunction with hoods, cowls, louvers and shields. Lights will also be directional to ensure that light is directed to the intended areas only.
- External lighting will be on PIR sensors that are sensitive to large objects only (so that they are not triggered by passing bats) and will be set to the shortest time duration to reduce the amount of time the lights are on.