

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	250702
Address:	19 Grovelands Road, Spencers Wood, Wokingham, RG7 1DP.		
Proposal:	Full application for the proposed erection of new church building (Use Class F1), construction of front wall and gates along with associated landscaping and car parking following demolition of existing buildings.		
Type of Development:	Minor All other developments		
Site Visit Made:	Yes/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 Phase 2 Bat Survey (Jonty Denton, July 2024), Preliminary Roost Assessment (Dr Jonty Denton, January 2025) and Preliminary Roost Assessment (Ecology Partnership, October 2023).

The outbuildings behind the bungalow were considered by Ecology Partnership to have a negligible suitability for roosting bats. The PRA desktop study does not include records of bat roost available from search of local planning history or bat group/TVERC data. Ecology Partnership found that the bungalow east facing side roof had gaps in the soffits and multiple slipped tiles that would present opportunities for crevice roosting bats. A scattering of approximately ten droppings were recorded in the loft void at the northern aspect of the building. DNA analysis confirmed these droppings originated from Soprano Pipistrelles (*Pipistrellus pygmaeus*) The droppings considered to be relatively fresh, and Ecology Partnership considered that the building supports a 'Confirmed' Soprano pipistrelle roost. Three emergence surveys were therefore required to determine if bats are using the external features of the bungalow, in addition to the type and number of bats present, and well as confirmation of the number and soprano pipistrelles roost type. The results were to inform an application for a Natural England licence to legalise the loss to bat roosts and to ensure that mitigation and compensation measures are implemented. The Ecology Partnership advised that a comprehensive mitigation strategy would be developed to ensure that the favourable conservation status of bats in the local area

will not be impacted by the proposed development. They state, “no works to the building can be undertaken without a Natural England Bat Licence, or if the surveys identify that a licence is not required”.

I agree with the PRA conclusion that suitable mitigation strategy can be developed and further compensation measures and working practises need to be secured. Recommendations included bat-sensitive lighting design and provision of replacement roosting opportunities bat boxes hung on mature trees around the site, or on retained buildings in addition to integral bat boxes/bat tubes e.g. Schwegler 2FR Bat Tubes and Habibat 001 bat boxes within the building. Bat tubes should be placed as close to the eaves or gable apex as possible and not above windows to reduce the risk of cat predation.



Figure 2: Map showing the extent of the loft void (yellow line) with the location of the bat droppings (green star)

The bat activity surveys of the Phase 2 Bat Survey (Dr Denton, July 2024) survey recorded no emergence or re-entry. One Soprano pipistrelle emerged from the rear of 21 Grovelands Road. Bat activity recorded by the surveyors was low.

It is not clear when the Ecologist had access and therefore the emergence survey design took account of the PRA report. No further local records data search was undertaken to inform the survey's design.

The Phase 2 Bat Survey report includes no updated internal or external inspection, examination of bat dropping or information the condition or the building. The Ecologist does not confirm if there has been any deliberate obstruction of the bat roost or assess if any changes to the build or works undertaken could have affected the results of the bat activity survey. I note no details of names, training and

experience of the surveyors are given. Contrary to best practice, the report fails to record the presence of floodlights on the outbuildings.

I am not satisfied that in the absence of the Mitigation Strategy and compensation proposed in outline by Ecology Partnership that the Phase 2 report demonstrates that the application complies with Local Plan policies CP3, CP7 and TB23 or the NPPF. Based on the 2024 emergence survey I believe the applicant is unlikely to secured European protected species licence. I consider that the loss of the roost needs to be compensated, and the application currently fails to demonstrate that there will be no negative direct or indirect impacts on bats. Nor that wildlife will be maintained and enhanced in line with local planning policy, the NPPF and the LPA legal duties. Contrary to the Guidelines the Phase 2 Bat Survey fails to state how long the bat activity survey is valid for and when up-date surveys must be undertaken.

The NPPF paragraph 187 states that planning decisions contribute to and enhance the natural and local environment by d) minimising impacts on and providing net gains for biodiversity and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs. According to Local Plan policy CP3, 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 to the above criteria through the submission of Design and Access Statements, clear and informative plans, elevation and streetscenes.

CP7 states that development which may harm species of principle importance of importance for wild flora and fauna, whether directly or indirectly, will be only permitted if mitigation measures can be put in place to prevent damaging impacts.

Therefore, in order to mitigate the loss of the confirmed roost and multiple potential roosting features, and to maintain and enhance bat as required by CS3, CS7 and MDD TB23, submission and approval of mitigation strategy that includes all of the mitigation and compensation set out in section 4.8 to 4.13 of the Preliminary Roost Assessment should secured by planning condition. I advise that the mitigation strategy included a pre-commencement survey, avoidance mitigation measure, soft demolition and detail of the works that need to be supervised by an ecologist.

Conditions & Reasons (if required)

Condition: No development or other operation (including any tree pruning, roof covering/tile removal, storage of materials or machinery, or site set-up) shall commence on site until final Mitigation Strategies detailing avoidance mitigation compensation and enhancement measures affecting potential roosting features and any bat roosts on or adjacent to the site, has been submitted to and approved in writing by the local planning authority. The Mitigation Strategies shall include all the recommendations given in Section 4 Preliminary Roost Assessment (Ecology Partnership, October 2023).

The Mitigation Strategies will address:

- Timing and methods of re-survey and/or pre-commencement checks as necessary
- Timing and methods of activities
- Provision of new bat roosting

- Impact on and replacement of existing roosts within the Zone of Influence
- Biodiversity-sensitive external lighting and boundary habitat protection.
- Bat-friendly nectar and protein-rich flowering plants. And
- retention and protection of trees, shrubs and hedges growing in accordance with BS5837: 2012.

The scheme shall be implemented as approved.

Reason: To ensure that bats, a protected and priority species (as per the NPPF), are not adversely affected by the proposals. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: If the development hereby approved does not commence (or, having commenced, is suspended for more than 6 months) within 3 months from the date of the planning consent, the approved ecological measures secured through Condition X 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
- ii) 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 and thereafter protected, retained and maintained in accordance with the proposed new approved ecological measures and timetable.

CL4 Prior to the commencement of the development there shall be submitted to and approved in writing by the local planning authority a scheme of wildlife-friendly landscaping, which shall specify species, planting sizes, spacing and numbers of trees/shrubs to be planted, and any existing trees or shrubs to be retained.

Planting shall be carried out in accordance with the approved details in the first planting and seeding seasons following the substantial completion of the first building.

Any trees or plants which, within a period of 10 years from the date of the planting (or within a period of 10 years of the occupation of the buildings in the case of retained trees and shrubs) die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species or otherwise as approved in writing by the local planning authority.

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

CL7

a) No development or other operation shall commence on site until an Arboricultural Method Statement and Scheme of Works which provides for the retention and protection of trees, shrubs and hedges growing on or adjacent to the site in accordance with BS5837: 2012 has been submitted to and approved in writing

by the local planning authority. No development or other operations shall take place except in complete accordance with the details as so-approved (hereinafter referred to as the Approved Scheme).

b) No operations shall commence on site in connection with development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening or any other operation involving use of motorised vehicles or construction machinery) until the tree protection works required by the Approved Scheme are in place on site.

c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within an area designated as being fenced off or otherwise protected in the Approved Scheme.

d) The fencing or other works which are part of the Approved Scheme shall not be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery and surplus materials removed from the site, unless the prior approval in writing of the local planning authority has first been sought and obtained.

Reason: To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of amenity value to the area, and to allow for verification by the local planning authority that the necessary measures are in place before development and other works commence Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies TB21 and TB23.

Date:

23/06/25

Signed:

T Cuss