

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260126
Address:	Riseley Farm, Part Lane, Swallowfield, Wokingham, RG7 1TB.		
Proposal:	Application for the Listed Building Consent for the proposed repair and renovation of existing Grade II listed farmhouse, including chimney/fenestration alterations, internal alterations and external landscaping.		
Type of Development:	Other Listed Building alteration or extension		
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 Ecology Technical Note, and the Design and Access Statement, Heritage Statement and Method Statement Historic Repairs reports (Heritage Fusion, Ref 2198). I have also reviewed the plans and elevations submitted in support of the listed buildings application, local planning history and the Small Barn Riseley Farm Preliminary Ecological Appraisal. 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 in England. A bat roost is interpreted as “<i>any structure or place used for shelter or protection</i>” whether or not bats are present at the time. According to the Ecology Technical Note the farmhouse has “<i>multiple lifted roof tile on all elevations</i>”. The Ecologist states that if the proposed development does require any roof works to take place, further Bat Emergence Surveys will need to be undertaken to determine the absence or presence of bats. The Technical Note includes no desk top assessment or internal or detailed external inspections for evidence and bat roost features. No photos of the potential roosting features are included in the Technical Note. The data search the Ecologist undertook for the Preliminary Ecological Appraisal for Small barn at Riseley Farm failed to include local records centre or bat group data searches or local planning history. The			

Ecologist is therefore unaware of the bat roosts recorded in the large barn to the west, and at Glass Pool Farm. The Technical Note does not provide an assessment the bat roost potential of the house and take into account these local records.

I consider assess that the repair works proposed to all the chimneys needs be considered as roof works. The level of risk of causing disturbance and injury to bats, or loss of potential roosting features, and the avoidance mitigation measures need to access tall chimneys in hard-to-reach parts of the roof are very similar or the same as undertaking roof repairs. Serotine bats roost in small cavities or crevices with high access points and hibernation sites include cavity walls and disused chimneys. The most abundant and widespread bat species Soprano and Common pipistrelle are crevice-dwelling bats. According to the submission the house supports suitable features for these species which could be destroyed or disturbed, and bats injured as a result of the proposals. In order line, repoint or remove any part of the chimneys, it is highly likely scaffolding would be erected to provide contractor access and protect roof tiles. In the absence of a Preliminary Roost Assessment and mitigation strategy to avoid, reduce risk and mitigate impacts for disturbance or loss of roosting features and injury to bats the application can not be supported.

The Conservation of Habitats and Species Regulations 2017 (as amended) Regulation 9(1) imposes a duty on the LPA in relation to *“functions which are relevant to nature conservation...so as to secure compliance with the requirements of the Directives”*. Under the Habitat Regulations, there is a duty upon WBC as the competent authority, to have regard to the requirements of the EC Habitats Directive in the exercise of any of their functions. Government Circular 06/05 states that: *“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.*

Summary

Unless a Preliminary Roost Assessment for the property which confirms absence, why the need for further surveys has been ruled out, and includes detailed bat mitigation strategy including proposed timing and supervision by a licensed ecologist the application must not be approved. If a detailed roost assessment survey and mitigation strategy and any further survey subsequently recommended are not submitted, the application may be refused on lack of ecological information and failure to comply with policies CP3 and CP7 and the NPPF.

Conditions & Reasons (if required)

Awaiting a Preliminary Roost Assessment and mitigation method statement.

CL7

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 wildlife 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: Local Plan Core Strategy policies CP1, CP3 and CP7 Managing Development Delivery policies TB23 and TB24.

Date:	13/02/26	Signed:	T Cuss
--------------	----------	----------------	--------

