

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	242746
Address:	5 Aldbourne Avenue, Earley, Wokingham, RG6 7DB.		
Proposal:	Householder application for the proposed erection, first floor extension and second floor side and rear extension following the demolition conservatory, installation of roof lights, dormer window and changes to existing fenestration.		
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 Preliminary Roost Assessment (Matthew Game, 25 November 2024) and Design and Access Statement, and reviewed the plans and elevations submitted in support of the application.

All British bat species are fully protected by the Wildlife & Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended). In summary, the legislation combined makes it an offence to:

- Damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a bat;
- Deliberately, intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair the ability of bats to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species; and
- Deliberately kill, injure or take any bat.

A bat roost is interpreted as “any structure or place used for shelter or protection” whether or not bats are present at the time.

I note the Ecologist is not consistent on which edition of the Bat Surveys for Professional Ecologists: Good Practice Guidelines they refer to. Sections 1, 4 and 5 all refer to Collins 2016 3rd edition, however Section 2.2 refers to the 2023 4th edition. It is therefore unclear whether the survey and assessment methodology all

take account of the current March 2024 guidance. The Preliminary Roost Assessment bibliography also includes multiple outdated and superseded guidance documents.

While the Ecologist has referred to outdated guidance, I can agree with their conclusion that due to several potential roost features the house has moderate value for roosting bats. The proposals will result in the permanent loss of potential roosting features and could cause disturbance, death or injury to bats any bat present. I support the recommendation for measures required to adhere to guidance, legislation and planning policy that two bat emergence surveys are required during the active bat season (May – September) to confirm presence or likely absence. It is essential that the recommended emergence surveys are completed in accordance with Good Practice Guidelines 4th edition amended on 27 March 24. At least two separate dusk emergence surveys should be undertaken between May to August at least three weeks apart, preferably more. In years with a cold spring the surveys should not all be completed in May. I agree with the Ecologist that a minimum of three surveyors are required to provide full coverage of the building.

The Ecologist fails to refer to UK Bat Mitigation Guidelines (CIEEM, September 2023). If bats will be impacted by the proposals, the Planning Authority must be satisfied that Natural England are likely to grant a European Protected Species Licence (EPSL) therefore surveys must be complete, and mitigation proposed in line with up-to-date guidance. 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"*. In line with Local Plan policy and the NPPF, emergence survey report that includes any necessary mitigation strategy must be submitted before the application can be determined.

I support the proposal that a low impact lighting strategy will be adopted for the site during and post-development, however external lighting design should only include the warm white ≤300K and the use of lighting of 2000 lumens cannot be justified. The Ecologist should have taken into account ILP/BCT 'Bats and Artificial Lighting in the UK' GN 08/23 which must inform the strategy, which would preferably be submitted prior to determination to mitigate impacts on birds and invertebrates as well as foraging and commuting bats. The provision of at least one Schwegler SP1 Sparrow Terrace and/or Schwegler No17 Swift Nest Box recommended is consistent with MDD policy TB23 and CP7 and should be secured by planning condition once the application can be determined.

The application form incorrectly states that there are no trees or hedges on the sit/within falling distance or that will be impacted by the development. According to Streetview and the aerial photos included in the Design and Access Statement and PRA, hedges will need to be pruned or removed to facilitate construction of the rear extension. Trees and hedges aren't shown on the Existing or Proposed Site Plan. In addition, the tree in the Highway Authority verge could be impacted by contractor access, material deliveries and parking. Details and accurate plans showing the trees and hedges are needed to assess the design, impact on features, biodiversity

habitats or wildlife and secure protection and compensate for any unavoidable loss
In line with the requirements of the Local Validation List to assess and secure mitigation for impacts to trees and hedges I request updated site plans or an Arboricultural Impact Assessment are submitted prior to determination.

Summary

The results of the emergence survey must be submitted to the Planning Authority prior to the determination with a mitigation strategy, tree and hedgerow protection plan and landscaping proposals to ensure there is no net loss of biodiversity and habitat wildlife will be maintained and enhanced. If the emergence survey is not provided, the application should be refused on grounds that there is insufficient information for the Planning Authority to determine the impact of the proposals on bats which are protected species and a material consideration and failure to comply with policies CP3 and CP7.

Conditions & Reasons (if required)

Date:	6/12/24	Signed:	T Cuss
--------------	---------	----------------	--------