

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	242457
Address:	High View, Basingstoke Road, Spencers Wood, Wokingham, RG7 1AL.		
Proposal:	Householder application for the proposed erection of a two storey front,side and rear extension and a single storey rear extension with changes to 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 Report (John Wenman Ecological Consultancy ref S2791_PRA_a) and reviewed the plans and elevations submitted in support of the application.

Legal Protection

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 roost is defined as 'any structure or place which a bat uses for shelter or protection'. As bats tend to reuse the same roosts, legal opinion is that a bat roost is protected in law whether or not bats are present.

The Preliminary Roost Assessment Report (PRA) completed on 21st October 2024, observed a brown long-eared bat roosting in the attic where the eastern hips

connected to the ridge with a pile of approximately 70 – 80 medium-sized bat droppings clustered beneath. A further approximate of 50 medium-sized bat droppings were distributed along the line of the roof ridge and on stored items within the west section of the void. Medium-sized droppings are typically deposited by long-eared bat species (*Plecotus* spp.) The PRA records the following suitable/potential bat access points and roost features:

- Occasionally lifted roof tiles on the main roof and front porch;
- Crumbling ridge and hip mortar;
- A raised hip tile;
- Torn bitumen felt roof lining and unlined sections of the roof; and
- Open eaves with access to the uPVC soffit.

The lifted roof tiles, crumbling mortar and lifted hip tile on the front elevation directly lead inside the roof void, which was of a suitable size and condition for void dwelling bats, such as the locally recorded brown long-eared. Where roof lining is intact, there are potential roosting features for crevice-dwelling bats such as pipistrelle. The Ecologist states that evidence of crevice-roosting species is typically hidden from view in areas such as gaps between tiles and internal linings/insulation. The location of the roosting Brown long-eared and droppings correspond with the raised roof tiles and crumbling ridge mortar observed externally where the roof is unlined.

The nearby suburban area, grazing pasture and agricultural fields surrounding the property with linear hedgerows, scattered trees and tree lines provide continuous habitat could be used as a commuting route to high-quality foraging habitats for any bats roosting in the property. I agree with the Ecologist that this suggest that the roof void is being used as a transitional/summer day roost and that the house has a confirmed roost and of moderate potential suitability for bats. I note the desk study does not appear to have include further bat roosts with 100m of the site including 3 Brown long-eared roost.

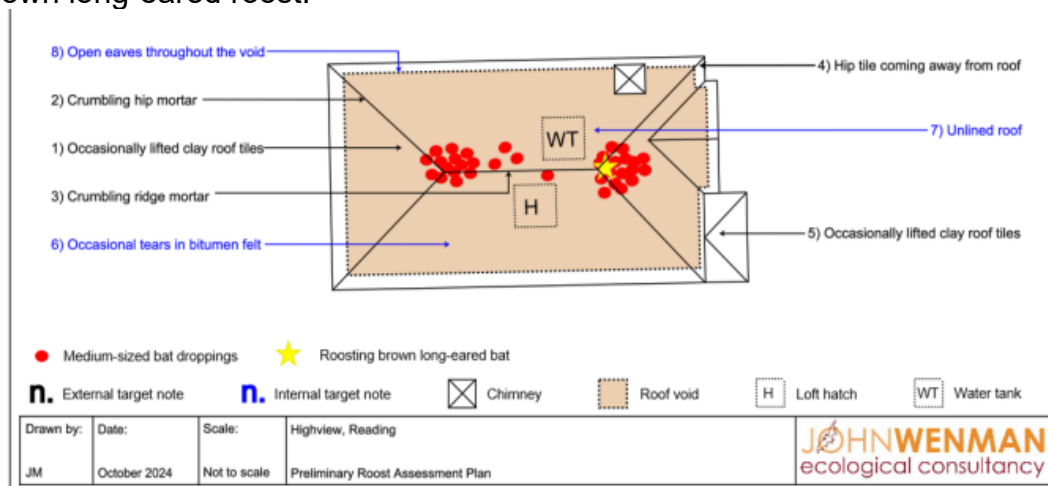


Figure 1. Preliminary Roost Assessment Survey Findings

It does not appear that the applicant has amended the designs as recommended by the Ecologist to avoid potential adverse effects on bats in the house. Therefore, the further survey recommended in PRA paragraphs 7.2.1 and 1.1.14 must be completed prior to determination to fully characterise the bat roost/s in the property, in order to undertake a full direct and indirect impact assessment of the development proposals on bats. In line with the current updated 4th edition Good Practice

Guidelines, a minimum of two dusk emergence survey visits should be undertaken in the period of May to September, with at least one of the surveys between May and August. The survey visits should be spaced at least three weeks apart.

A mitigation strategy setting out avoidance, mitigation, compensation and enhancement measures will be required to satisfy the third derogation licensing tests, to demonstrate that the 'favourable conservation status' of the bat species using the house is maintained during the construction phase and post development. I support the Indicative Mitigation Strategy set out in section 8.2. The detailed mitigation proposals designed in line with CIEEM UK Bat Mitigation Guidelines 2023 should be include in the bat emergence survey report.

Protected species are a material consideration and the presence/absence of a species and the implications of the proposal on protected species must be considered at the point of determination. It is not possible to condition these surveys as part of granting permission.

Summary

The aim of the PRA is to determine the actual or potential presence of bats in the property and whether further survey and/or mitigation would be required for future proposed development activities. The further survey recommended to characterise the roost, and to establish the presence or absence of other bat roosts in the property, to be able to assess fully whether the development proposals will have an adverse effect on bats and design a mitigation strategy must be submitted prior to determination. I am happy to provide comments in summer 2025 when surveys have been undertaken. If further bat surveys and mitigation proposals are not submitted, lack of ecological information and failure to comply with policies CP1, CP3 and CP7 can be included in reasons for refusal.

Conditions & Reasons (if required)

Awaiting submission of nocturnal bat surveys and mitigation strategy.

Date:	7/1/25	Signed:	T Cuss
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