

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251318
Address:	Hatchgate End, Hatch Gate Lane, Cockpole Green, Wargrave, RG10 8NE.		
Proposal:	Full application for the proposed erection of 1no. 5 bedroom dwelling to include rooflights, 1no. balcony, 2no. Juliet balconies plus solar panels following demolition of existing dwelling.		
Type of Development:	Minor Dwellings (1-9)		
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 Material Changes Check and Bat Emergence/Re-entry Surveys Preliminary Ecological Appraisal (Arbtech 2022) Preliminary Ecological Appraisal and Roost Assessment (Arbtech, 4 June 2024) and Bat Emergence and Re-Entry Surveys (BERS) (Arbtech, 13 June 2024), and Arboricultural Impact Assessment, Method Statement and Tree Protection Plan (PJC Ref 6915/25/01, 6 August 2025). I have also reviewed the and Design and Access Statement (JCE, Ref 1335, 2 June 2025) and plans and elevations submitted with the application.

The PEA/PRA and Material Changes Check reports summaries that Windrush Ecology previous recorded a live Brown long-eared bat in the southern roof space, evidence of the roost and observed one BLE bat emerging from the ridge near the chimney on in 2017 and 2018. 2022 inspections carried out by Arbtech recorded several hundred droppings with approximately 150 in each loft space. Three 2022 evening surveys recorded Natterers, Noctule, Common and Soprano pipistrelle foraging or commuting. n additional update survey was conducted in 2024. No significant changes were noted during either the internal inspection or the dusk emergence survey carried out on 4 June 202.

I agree with the conclusion of the BERS that a European Protected Species Licence will need to be issued by Natural England to legally permit the proposed works to proceed. Contrary to local policy and opportunities for best practice a compensation

roost suitable for long-eared bats has not been recommended. I request that the recommended mitigations measures of erection in mature tree/s prior to commencement works of cavity-style bat boxes in addition to provision of modified ridge tiles or access tiles to an adapted bat loft and integration of and two Vivara Pro Woodstone or Habitatbat Built-in 001 Bat Boxes are also secured by condition. Windrush Ecology proposed that two bat tiles would be created at the ridge of the house to provide continued access for bat into the north-western and south-eastern loft spaces. The bitumen and hessian roofing felt were to have been used instead of Breathable Roof Membranes (BRMs) as these can entangle and trap bats within loose fibres.

CP3 states that CP3 Planning permission will be granted for proposals that:

c) Have no detrimental impact upon important ecological, heritage landscape (including river valley) or geological features or water courses.

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.

According to CP7 Which may harm habitats or, species of principle importance, veteran trees or features that are of major importance for wild flora and fauna, whether directly or indirectly. And Mitigation measures can be put in place to prevent damaging impacts or compensation measures is provided to offset the losses.

The Good Practice Guidelines advises that negative impacts on bats can arise from light disturbance, modification of access points to roosts either physically or indirectly, for example lighting or removal of vegetation. Section 5.1 states roost surveys should be designed to answer specific questions such as "What is the current arrangement of vegetation and lighting in relation to access points". I am concerned that the Ecologist has failed to comment on the inappropriate floodlighting and recommend removal of the lights which may be illegally obstructing bat roosts and discouraging access to roost as well as foraging and commuting. To mitigate the impact of the development any external lighting which can be demonstrated to be necessary must be designed to retain dark corridors and ensure access to replacement roosting opportunities and foraging and commuting corridors for bats and other wildlife. Submission and approval of a wildlife-friendly external lighting scheme which complies with [Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23](#) and current best practice must therefore be secured by condition.

Figure 5: B1 south-eastern corner



Figure 1: B1 western elevation



To protect wildlife during clearance and construction implementation in full accordance with the mitigation avoidance and enhancement recommendations made in the PEA/PRA should also be secured.

Conditions & Reasons (if required)

Condition: Unless otherwise agreed in writing by the council, all works are to be carried out in full accordance with the precautionary working method mitigation recommendations given the submitted Bat Emergence and Re-entry Surveys report (Arbtech, 13 June 2024) and the mitigation methods and biodiversity enhancements recommended in the Preliminary Ecological Appraisal and Roost Assessment (Arbtech, 4 June 2024). Enhancements must include two Habitatat built-in 001 (/Vivara pro or functionally similar) bat boxes must be integrated into the dwelling at least 4m above ground level and at least one ridge bat access tile with access to a roof void. Only Type 1F bitumen and hessian roofing felt within the Breathable Roof Membranes must not be used unless a copy of Natural England snagging propensity certificate is submitted.

Within one month of substantial completion a short closing-out report demonstrating that the ecological mitigation and enhancement measures have been implemented to the satisfaction of the Owner's Ecologist is to be issued to the council.

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

Condition: No works or other operation shall commence on site until a licence for development works affecting bats has been obtained from the Natural England and or an email from Natural England demonstrating that the site has been registered under the bat mitigation class licence and the approved Method Statement have been submitted to the local planning authority. Thereafter mitigation measures approved in the licence shall be maintained in accordance with the approved details.

Reason: To ensure that individuals and the populations of protected species bat, a material consideration, are not adversely affected by the development. Relevant policy NPPF Section 15 and Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: Prior to commencement a "lighting design strategy for biodiversity" designed in accordance with best practice including in accordance with [Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23](#) shall be submitted to and approved in writing by the local planning authority. The strategy shall a) identify those areas/features on site that are particularly sensitive for bat, birds and amphibians and show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

Condition: 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. Public: Information that can be seen and used by everyone inside and outside the Council.

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 value to biodiversity and wildlife, 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 CP3 and CP7 Managing Development Delivery policy TB23.

Condition: No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the written approval of the local planning authority. If within a period of **ten years** from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted at the same place, unless the local planning authority gives its written consent to any variation

Reason - To secure the retention of trees, shrubs and hedges growing within the site which are of value to wildlife and no net loss of biodiversity habitat. Relevant policy: NPPF Section 15, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policies TB23 and TB21

Date:	29/08/25	Signed:	T Cuss
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