

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	242437
Address:	125 Beech Lane, Earley, Wokingham, RG6 5QD.		
Proposal:	Householder application for the proposed erection of a two storey front,side and rear extension and a single storey rear extension with a balcony and changes to fenestration and installation of game room.		
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 (Plan Ecology, 31 October 2024) and the Arboricultural Impact Assessment and Method Statement (All Arboriculture, Ref AAAIA125B, 14 October 2024) and reviewed the other plans and elevations submitted in support of the application.

I am concerned that the methodology of the internal and external inspections for the bat roost assessment have been undertaken with an outdated methodology. The references in section 7 of the PRA are out-of-date, contain multiple errors and fail to make reference to the 2023 Bat Surveys for Professional Ecologists: Good Practice Guidelines as well as CIEEM UK Bat Mitigation Guidelines (September 2023). I request that future reports prepared by Plan Ecology include an up-to-date reference list, omit outdated guidance the Ecologist has not used and that all surveys are undertaken and mitigation proposed only in line with the most relevant best practice.

All species of British bat 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 "any structure or place used for shelter or protection" whether or not bats are present at the time.

Despite my concerns regarding the report, I am able to agree with the Ecologist's conclusion. The PRA report fails to take account or provide plans of the proposed outbuilding. To avoid net loss of biodiversity habitat I request that a condition is imposed to secure the Arboricultural Method Statement proposed in the AAAIA125B and the tree protection measure in Tree Protection Plan AATPP125B.

The Ecologist has failed to mention the floodlights on both rear and front elevation. Light pollution can discourage bats, birds and nocturnal animals from using breeding and resting places, established flyways and foraging areas or corridors or cause disturbance. Such disturbance can *constitute an offence under relevant wildlife legislation. In order to ensure that the development provides enhancement and maintenance wildlife using the site, submission, approval and maintenance of a biodiversity-sensitive external lighting scheme should be secured. The reference list does not refer to* Bat Conservation Trust/ ILP [Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23](#) or other relevant lighting guidance.

I note that the Site & Location Plan Drg 24/954-04 is not consistent with the AIA Tree Protection Plan Ref AATPP125B. Unless the position of the outbuilding is revised to ensure that the tree protection fencing to the rear of the outbuilding is erected as proposed by the Arborist the Site & Location Plan and the development should not be approved. To protect the retained habitats including trees and hedges, an Arboricultural Method Statement planning condition should be imposed.

Summary

Provided that the tree protection proposed in the AIA is secure, the site & Location Plan are amended, and an external lighting scheme is secured there are no ecological objections to the development as proposed.

Conditions & Reasons (if required)

Condition: Prior to commencement of development a "Lighting Design Strategy for biodiversity" 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 bats, birds and amphibians that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

b) 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.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF paragraph 191 Section 15 Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: No development or other operations shall take place except in complete accordance with the details as approved Arboricultural Method Statement. 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 Arboricultural Method Statement and Scheme of Works Scheme are in place on site.

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 Arboricultural Method Statement and Scheme of Works Scheme.

The fencing or other works which are part of the approved Arboricultural Method Statement 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 biodiversity and 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 policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Despite ecological surveys being undertaken which suggest that protected species are not using the application site, bats are mobile creatures, and it is possible that protected species may be encountered once works commence. I recommend the following informative should be appended to any such consent:

Informative: Bats are a protected species under the Conservation of Habitats and Species Regulations 2017 (as amended). Should any bats or evidence of bats be found prior to or during the development, all works must stop immediately and an ecological consultant contacted for further advice before works can proceed. All contractors working on site should be made aware of the advice and provided with the contact details of a relevant ecological consultant.

Date:	4/11/24	Signed:	T Cuss
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