

# MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252520
Address:	Treetops, Fleet Hill, Finchampstead, Wokingham, RG40 4LE.		
Proposal:	Application for submission of details to comply with the following condition of planning consent 250957 dated 30/07/2025. Condition 3 relates to an ecological enhancement strategy.		
Type of Development:			
Site Visit Made:	No		
Summary Of Recommendations			
<input type="checkbox"/> No comment <input type="checkbox"/> No objection <input type="checkbox"/> No objection subject to conditions (and reasons) stated below <input checked="" type="checkbox"/> Request further information before determination as stated below <input type="checkbox"/> Objection due to the reason(s) stated below			
Comments On Proposal			
<p>I have read the revised Ecological Enhancement Plan report (Cherryfield Ecology, October 2025) and reviewed the Fleet Rise planning history including Ecological Appraisal (Cherryfield Ecology, November 2021), Bat Survey – Fleet Rise Annex (CA Ecology, 2015), and the Addendum Bat Survey Report (AA Environmental, Ref 183303 October 2018).</p> <p>Cherryfield Ecology's Ecological Enhancement Plan does not refer to Addendum Bat Survey Report submitted to discharge 181295 condition3. Nor was this report submitted to support application 250957. I am concerned that Ecologist has failed to include the two Ibstock Enclosed Bat Box B bat tubes that should have been installed the Tree Tops new build to additional roosting opportunities and compensate the loss of Common pipistrelle, Soprano pipistrelle and Brown long-eared bat roosts resulting from the demolition of the Annex. According to Cherryfield's Ecological Appraisal a minimum of two Schwegler 2FR boxes should have been installed into the gable ends of the new dwellings. I recommend that the proposal to mount bat boxes externally after completion of construction of the house is not acceptable and fails to comply with CIEEM best practice and the details approved under permission 200493. Neither integral nor external bat boxes are shown in figure 8.</p> <p><b>Condition 3 only asks for information regarding enhancements on site and does not ask for any information detailing the mitigation and compensation. As such, the Ecological Enhancement Plan does state that 'All enhancement measures outlined below are to be in addition to any mitigation measures required on site.'</b></p>			

In regard to the enhancement measures included for bats, external boxes have been stipulated, as construction of the building had already been completed prior to the Ecological Enhancement Plan being drawn up to discharge condition 3. As it was a 'pre-occupation' condition the building works were completed prior to the condition requiring discharge and this reduced the scope of measures that could be included on site, such as the inclusion of built in boxes within the building. Four bat boxes are already installed on trees within the grounds and these are shown on Figure 8 of the report.

Regarding the mitigation, the Addendum Bat Survey report referenced (to discharge condition 3 of 181295) was in reference to the loss of the annex/workshop. This building was removed, however, it appears that the intended replacement dwelling under that application was not built and as such the recommended integrated bat tubes were not installed. As we understand it, this application, and the ownership of the land at the time, pre-dated the current applicant's ownership. Following this application and the demolition of the buildings, the then owner split the site and sold the eastern side of the land to the current applicant in 2020.

Subsequent planning applications by the current applicant have since been submitted for the construction of a new dwelling on the land purchased in 2020.

During those applications (213435 and 220792), further survey work was undertaken which found that an additional building on site, that fell within the applicants ownership, also supported a bat roost. The appropriate licence and mitigation was proposed and planning reference 220792 was granted, with condition 3 stipulating the need for a licence. However, during the time of the planning application (2021/2022), the building suffered storm damage and was concluded to no longer support a roost (decided between the LPA and the applicant). As such, a variation of condition 3 was granted, with the requirement for a licence removed and the condition being converted to an enhancement condition.

In summary, three buildings that supported bat roosts have been lost since 2018, the annex & workshop and the outbuilding.

It is unknown whether a bat licence was obtained for the demolition of the annex and workshop, however, this predates the current applicants ownership of the land and the location of the demolished annex & workshop falls outside of the boundaries of their land.

The requirement of a licence for the outbuilding that was within the applicants ownership was removed following the variation of the condition.

The Ecological Appraisal also advised that two open fronted Robin boxes and two songbird boxes would be installed in the woodland/trees. Swift nest boxes were recommended to be integrated into external walls of the building in addition to at least one insect box, and new hedgerows were to be planted. According to the revised Ecological Enhancement Plan only three woodland bird boxes have been installed. The plan provides no timetable for installation of the additional mitigation. Unless the Ecological Enhancement Plan includes the mitigation and enhancement recommend by Cherryfield in 2021 and the mitigation for bats secured for the demolition of the Annex in 2018, WBC Ecology are unlikely to support approval of the scheme and recommend discharge of condition 3.

The recommendations for enhancements within the Ecological Appraisal are suggestions for the site. The subsequent Ecological Enhancement Plan supersedes this and details the definitive measures. In drawing up the Ecological Enhancement Plan, I deemed the three songbird boxes to be sufficient, given the ample suitable natural habitat on site for nesting bird. Instead of a fourth songbird box, I recommended an owl box as I felt this was more relevant and more beneficial to the site. In regard to the timing of the installation of the owl box, the first row of Table 1 states that *'All other boxes and measures based in the surrounding area will be installed when the final landscaping is undertaken or when works are complete on the building.'*

In regard to hedgerow, the Ecological Appraisal suggests that a hedgerow could be included within the proposed plans. This has been included, along the eastern boundary, full details of which are or will be included within the landscaping plan drawn up to answer Condition 5 of planning.

Similarly, an insect box was suggested in the Ecological Appraisal. However, instead, several log piles have been created on site, which I deemed to provide ample suitable habitat for invertebrates, and herpetofauna.

To ensure that roosting, foraging and commuting bats are not negatively impacted by light pollution and bats, and birds are not deterred from using the enhancements or retained habitat, I request that a revised report includes full details of all external lighting that has been installed. Lighting does not comply with the Ecologist proposals must be amended.

As above, condition 3 does not request any information regarding detailed lighting proposals, therefore, a recommendation has been included to ensure that any lighting that is installed is in line with the bats and lighting guidelines.



Lighting will be in line with the new bats and lighting guidelines, thus protecting commuting and foraging routes.

Lighting should be in line with the BCT lighting guidelines (Bat Conservation Trust, 2023)

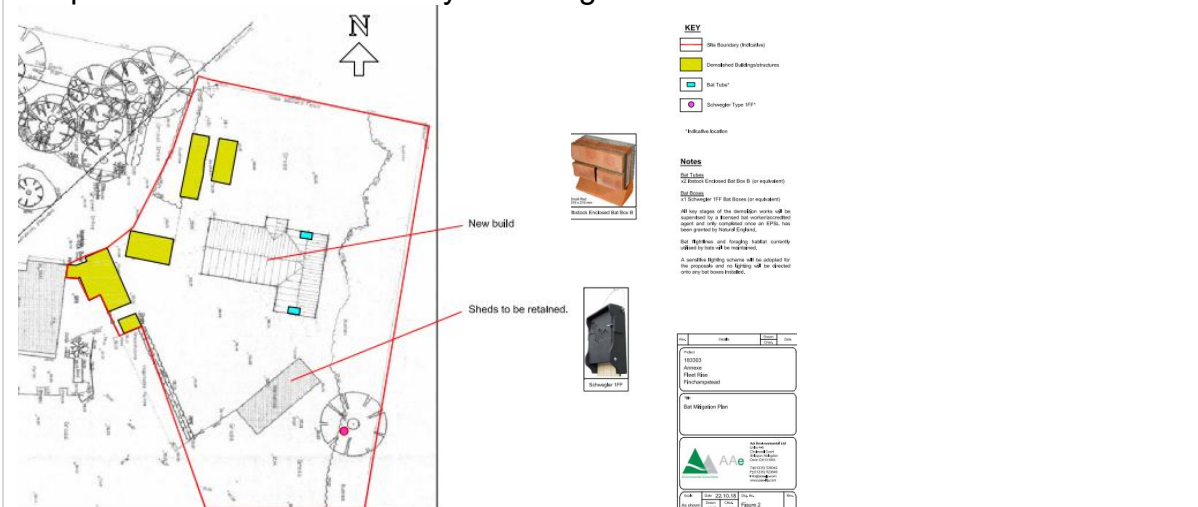
<https://www.thebct.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>

This lighting should be of low level, be on downward defectors and, ideally, be on PIR sensors. Using LED directional lighting can also be a way of minimising the light spill affecting the habitat. No up-lighting should be used.

Local Plan CP3 states planning permission will be granted for proposals that (d) maintain or enhance the ability of the site to support fauna and flora including protected species. Development proposals are required to demonstrate how they have responded through the submission of clear and informative plans. The submitted ecological enhancement proposals need to include comprehensive details of the compensation planting, replacement bat roosts for Brown long-eared, Soprano and Common pipistrelle bats, and mitigation for the cumulative impact of the development on birds and mammals to demonstrates the populations can be maintained and enhanced on the site. The Enhancement Plan must also include a timetable for implementation of the additional enhancement measures proposed.

I am happy to provide detailed comments on the revised Ecological Enhancement Plan when the applicant provides confirmation of all compensation roost features licensed by Natural England to be provided in the new dwelling. I therefore request submission of the Method Statement and a copy of the European Protected Species

Licence granted by Natural England for the demolition of the Annex and results of the pre-commencement survey and mitigation measures used.



### Conditions & Reasons (if required)

Awaiting copy of the EPS Licence and supporting detailed Method Statement approved by Natural England for demolition of the Fleet Rise Annexe.

Date:	23/10/25	Signed:	T Cuss
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