

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	242699
Address:	Barn Acre Cottage, Loddon Drive, Wargrave, Wokingham, RG10 8HN.		
Proposal:	Householder application for proposed double storey side extension and a single storey front extension.		
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 (Elite Ecology, July 2024) and Design & Access Statement, and reviewed the plans and elevations submitted in support of the application.

All species of British bat are protected under The Wildlife and Countryside Act (as amended) and The Conservation of Habitats and Species Regulations 2017 (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.

The external inspection recorded gaps in lead flashing around the dormers, and in wooden fascia, soffit box, eaves and bargeboards providing opportunities for bats and birds to enter the building. The building was found to have various slipped, lifted, and dislodged tiles, providing potential roosting opportunities for bats.

The artificial lighting with a sensor has been installed around entrance points to the property, although on the external walls some of the lighting is not on a sensor. The results of the DNA analysis identified the species to be Soprano pipistrelle. PRA Appendix C sets out guidance regarding the impact of artificial lighting on bats which both the Owner, their contractor and architect should consider. The Ecologist

highlights to the Owner that “current recommendations for all bat species specifies that no bat roost should be directly illuminated.” I suggest the Ecologist ought to have advised that existing floodlighting which disturbs and/or discourages a bat from using their breeding and resting places, established flyways or foraging areas can constitute an offence under the above wildlife legislation. Existing lighting should be angled, amended, or removed or avoid and minimize wherever possible the negative impact of lighting on bats and bat roosts. I recommend a bat-friendly lighting scheme is submitted prior to determination in order to demonstrate enhancement for birds, bats and nocturnal wildlife and avoid discharge of planning condition which may delay issue of a European Protect Species Licence.

The roof of the house was lined with a combination of bitumen felt and a breathable material. The internal inspection revealed a number of bat droppings scattered throughout the lost space both along the floor underneath the ridge beam, as well as on the exterior of the lining material. A deceased bat was found within the void, confirming bats can access the void. The Ecologist should have advised that breathable roof membranes have been found to kill bats and that any new roof lining should be bitumen 1F type roofing felt or a breathable membrane that has passed a snagging propensity test.

From the internal and external surveys undertaken the Ecologist concluded that the building has a high potential for supporting roosting bats. I agree with the recommendations in Section 5: *“a minimum of three further bat activity surveys are required on the structure, two of which should be conducted during the optimum bat activity survey season of mid-May to August (inclusive). It has been deemed that six surveyors will be required to cover the building. Further compensation, enhancement, and mitigation recommendations in relation to bats will be devised following the Activity Survey Results.”*

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. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.”* In this case because neither the presence or absence of protected species, nor the extent to which they may be affected has been established and there are no exceptional circumstances determining the application would not be in accordance with the planning policy, or other planning policy in relation to biodiversity. In line Local Plan policy, in order to approve the application, the direct and indirect effects of development on wildlife, species of principle importance, habitats and features must be considered in the nocturnal survey bat report and mitigation strategy recommended in section 0, 5 and 6 of the PRA.

Summary

The building supports roosting bats and a number of potential roosting features and access points, and a further survey would need to be undertaken to determine the presence/absence roosting bats. The application should not be determined until the

3 emergence surveys have been carried out between May and September as recommended in the PRA and the results submitted to the council.

Conditions & Reasons (if required)

Awaiting bat emergence survey report and compensation, enhancement, and mitigation proposal and detailed bat-friendly lighting plans.

Date:	20/11/24	Signed:	T Cuss
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