

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	242861
Address:	Jalens, Nine Mile Ride, Wokingham, RG40 3LU.		
Proposal:	Householder application for the proposed first floor extension (second bedroom plus shower 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 reviewed the Preliminary Roost Assessment (Plan Ecology, November 2024), Ecologist Statement (Bats) (GR Tournoff, 6 November 2024) and Report of a survey of Jalens for bats (Paula Cox, November 2005). I have also reviewed the plans and elevation and site planning history.

The Preliminary Roost Assessment (PRA) site description makes not reference to the woodland immediately to north of the application site and to the west of Footpath WOKW17 locally designated as Gorrick Plantation Local Wildlife Site. Nine Mile Ride is a Green Route.

In the UK all species of bats are protected under the Wildlife and Countryside Act (1981) as amended and the Habitats and Species Regulations 2017 (as amended). Under this legislation it is a strict liability offence to injure or destroy a bat or to disturb damage or destroy the resting place of a bat without first having obtained the relevant licence from Natural 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 bat survey undertaken in 2005 found evidence of disintegrating bat droppings at the base of the northern gable wall and a raised ridge tile at the northern gable apex. The Ecologist considered that the droppings were made by crevice-dwelling pipistrelle bats. The emergence survey undertaken in 2005 was not completed in line with best practice guidance and the survey started half an hour after sunset and not 30 minutes before. The Ecologist notes the high-powered security lights near

the top of the gable which were switched on at dusk. The Ecologist failed to proposed enhancements for bats including replacement roost features and rectification and amendments to the light pollution and obstruction of access to the roost.

Birds and species active at night including bats, are sensitive to light pollution. Artificial light might can disturb wildlife and protected species and/or discouraged from using their breeding and resting places, established flyways or foraging areas. This disturbance can constitute an offence under relevant wildlife legislation. A large amount of assessment and guidance on the impact of light pollution on bats has been published since 2005. But I note Dr Cox did not confirm when flood lights were install and whether erection of the lighting was reckless and deliberate.

While PRA photos 4-21 show the inappropriate and unnecessary floodlighting to the first floor which may deter bats from accessing the 2005 recorded roost. The proposed ecological enhancements on PRA page 11, fail to propose amendments and mitigation for the existing light pollution.



Photograph 5: Rear elevation.



Photograph 6: Rear elevation.



Photograph 7: Soffits in good condition



Photograph 8: Front elevation

I am concerned that Plan Ecology refer to out-of-date version of the Bat Surveys for Professional Ecologists Good Practice Guidelines 2016. I also note reference to 2004 Bat Mitigation Guidelines and not the current best practice in UK Bat Mitigation Guidelines (BCT, 2023). The Good Practice Guidelines 4th edition (amended 2024) suggests bat surveyors should record locations of external lighting to provide a comparison with new lighting proposals. *“Even one change such as an outside security light can have an impact and lighting needs to be considered in relation to current and new proposed bat access points. In the cases where no lighting change is proposed, it may not be necessary to measure lighting levels at all, but current lighting fixtures should be plotted. Guidance is available from BCT and ILP (2023)”*.

I note the 2024 PRA does not include photos of the northern gable end or ridge tiles. It is unclear whether Plan Ecology were made aware of the bat roost record and provided with Dr Cox 2005 Ecologist Statement (Bats).

According to WBC Local Plan policy CP3 proposals must not have a detrimental impact upon important ecological features or water courses and development must 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 to the above criteria through clear and informative plan. MDD policy TB23 requires development proposals also demonstrate how they provide opportunity through design and landscaping to incorporate new biodiversity features or enhance existing. They should ensure that developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors. There are no landscaping or enhancement proposals for new trees or hedging or to erect or incorporate bird or bat boxes in the extension.

Summary

I agree with PRA conclusion that the house currently has negligible bat roost potential. There are no ecological objections if submission approval and implementation of a biodiversity-friendly external lighting strategy and scheme of enhancements including an integral bat brick at a height of least 4m and/or boxes in mature trees and bird boxes are secured. To ensure benefits for wildlife and enhance the Public Footpath and provide wildlife corridors connecting to Gorrick Plantation Local Wildlife Site in line with CP1, CP3, CP7, MDD CC03 and TB123 consideration should be given to creating a hedgerow/tree line provide wildlife corridor along the PROW eastern boundary.

Conditions & Reasons (if required)

Prior to commencement of the development, details of biodiversity enhancements, to include one bird box and one integral bat brick on an unlit western elevation (or as agreed with the LPA) and native wildlife friendly landscaping shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved. 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 incorporate biodiversity in and around developments and maintain wildlife including protected species. of the NPPF. Relevant policy: NPPF paragraph 187 and 193 Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policies TB23 and CC03

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:	15/01/25	Signed:	T Cuss
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