

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	242350
Address:	East Court, Jubilee Road, Wokingham, RG40 3SD.		
Proposal:	Application for Listed Building consent for the proposed structural repairs and re-roofing.		
Type of Development:	Other Listed Building alteration or extension		
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 2024 Final Bat Survey Report (Spires Ecology, December 2024), and Heritage Statement. I have also reviewed the plans and elevations and Final Bat Survey Report (Spires Ecology, October 2023) submitted in support of the application.

All UK bat species are fully protected under the Wildlife & Countryside Act 1981 (as amended) (WCA) and Conservation of Habitats and Species Regulations 2017 (as amended); the regulations are commonly referred to as the Habitat Regulations and hereafter referred to as such. It is an offence to deliberately or recklessly to destroy or damage their roosts, or to disturb, kill or injure them. In summary Unless the relevant licence for derogation from the regulations from Natural England has first been obtained this legislation makes these specific actions an offence:

- Deliberately kill, injure, capture or take a wild bat;
- Deliberately, intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, to rear or nurture their young, to hibernate or migrate, or to significantly affect local distribution or abundance;
- Damage or destroy a place used by a bat for breeding or resting; and
- Intentionally or recklessly obstruct access to any place used by a bat for shelter or protection.

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 surveys in 2023 identified a total of twenty day and maternity roosts for Common pipistrelle, Soprano pipistrelle, Brown long-eared and Natterer's bats. 2024 activity surveys confirmed the house continues to be used as the brown long-eared maternity roost and four new roosts including a further Common pipistrelle maternity roost were identified. The 24 roosts, number of bats and the four species observed during the surveys, means that the site will require a European Protected Species Mitigation (EPSM) licence, or registration under the pilot Natural England Earned Recognition scheme, prior to the works being undertaken. While activity surveys have not been conducted on the garage, detailed Preliminary Roost Assessment survey was carried out in December 2024. I accept the Ecologist's assessment that they expect that bats will be using the garage in a similar way to the use they make of other buildings on the property; that is that there will be day roosts for pipistrelle species on an opportunistic basis.

Despite the Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd Edition that the 2024 Final Bat Survey Report refers being out of date I am satisfied with the report conclusion that a securing an Earned Recognition Scheme Licence may be used in order for the works to the garage to be undertaken lawfully. I support the proposal that the outbuilding will also be subject to a supervised soft strip to safeguard any bats present. The tiles will be replaced on a like-for-like basis, there will be numerous cavities available for bat roosting under tiles on the new roofs, and therefore no impact on the favourable conservation status of any species found present. Due to the entanglement risk posed by modern breathable roofing membranes, traditional F1 roofing felt will be used and will be a condition of any licence issued by Natural England

I request that implementation of the development proposals in accordance with section 5 Detached outbuilding, Timing, and Supervision, and provision of a copy of confirmation of registration of the site under a Eared Recognition Class Licence or a copy of the EPS licence and the Mitigation Strategy approved by Natural England prior to commencement of development are secured by planning condition.

Conditions & Reasons (if required)

Condition: No works shall commence until an email from Natural England confirming that the site including the outbuilding development works has been registered under a Earned Recognition Licence and a copy of the approved Mitigation Strategy have been submitted to the Council.

Thereafter mitigations measures detailed in the licence shall be maintained in accordance with the approved details.

Reason: To ensure that bats, a protected and priority species (as per the NPPF), are not adversely affected by the proposals. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: Works are to be carried out in full accordance with the recommendations and biodiversity enhancements given in Section 5 2024 Final Bat Survey Report (Spires Ecology, December 2024). 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.

No External Lighting

At no time shall external lighting be installed on the site or affixed to any buildings on the site without the prior written approval of the local planning.

Reason To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF paragraph 191 Section 15 (Conserving and Enhancing the Natural Environment), Core Strategy policies CP1, CP3 [and CP6 / CP11 and Managing Development Delivery Local Plan policy TB23.

Date:	16/12/24	Signed:	T Cuss
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