

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Householder	Ecology	App No: 242335
Address:	215 Wokingham Road, Earley, Wokingham, RG6 7DU.		
Proposal:	Application for submission of details to comply with the following conditions of planning consent 222744 dated 02/11/22. Condition 3 (Landscaping scheme), Condition 4(Electrical Vechical Charging), Condition 5(Bat boxes), Condition 6(Lightening Scheme), Condition 7(Bats).		
Type of Development:			
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 covering document.

The bat boxes of unspecified design which are proposed to be erected at some time in the future do not address the requirements of the planning condition. The Ecological Enhancements recommended in the Bat Emergence Report (Crossman Associates, ref D1142.001, 5 May 2022) are for one "*habibat bat box to be installed into each property*". The Ecologist advises that this model has good thermal properties making it suitable as both a maternity and hibernation roost. They explain the variety of facing that can be fitted to make the box unobtrusive and aesthetically pleasing. The Ecologist further stated that "The boxes should be sited approximately 3 m – 4 m high on exterior gable ends / walls". Appendix 1 also included details and images of Habibat and similar Woodcrete Schwegler bat tubes including details of installation within gable end walls.

Condition 5 states "*Prior to occupation of the development, a minimum of one habitat bat box is to be built into each property in line with D1142.001 Section 4 and Appendix II or bat bricks are to be installed on the building under the supervision of a suitably qualified ecologist and in line with manufacturer's guidance. A report confirming that the bat box/es have been installed, including a simple plan showing*

their location and photographs of the box/es, in situ, is to be submitted to and approved in writing by the Local Planning Authority". The applicant has neither proposed to install in future Habibat boxes in line with paragraph 4.6 and 4.7 or appendix 1, nor have they provided an ecologist's report or email confirming any bat box or tube has been erected or installed on site. *The submitted document suggest one bat box will be erected "near new trees"* is not the integral bat tube that is clearly specified in condition 5 or the clear detailed recommendations of the Bat Emergence Report. The applicant does not state when the box would be erected. Wooden or Woodcrete bat boxes in trees would not provide the mitigation and enhancement that would be provided by an integral bat tube or bat box in or even on the building. Bat boxes in trees will not compensate the loss of potential roosting features identified by Chase Ecological Consultancy in the roof coverings or hanging which have been lost.

If the development was implemented in accordance with condition 7 the Owner and their contractor would have been fully aware of all the advice in Bat Emergence Survey Section 4 and the requirement for the integral Habibat box to be installed in the wall. Site visit photo show that the contractor also used floodlighting during construction. If the site was operational after dusk light pollution may have had negative impact on birds and bats. I am therefore concerned that condition 7 may not have been adhered to and dismantling the roof and cavity wall demolition was not undertaken by hand taking precautions for bats. Root Protection Areas of the trees the owner proposes to be retained will have been compacted by storage. I suggest the Owner provides any evidence available demonstrating that the demolition and construction was undertaken in line with condition 7.



If landscaping has not been previously approved, it appears that the applicant is in breach of condition 3 which required a scheme to be submitted and approved within 3 months of determination of the planning permission. The drawing provided does not state that gaps will be left in or under the fencing gravel boards to allow through hedgehogs. To recommend approval of condition 3, 13x13cm hedgehog gaps must be left/created in each of fences. The photographs provided show refugia and habitat suitable for reptiles and common amphibians as well as storage in the root protection areas of existing trees. It is difficult to identify the species of the plants in pots shown but I would not recommend that small plants are likely to establish as healthy trees within 5 years. Orange trees are inappropriate. Subject to the advice of Trees & Landscape, as they are very close to the house and subject to Ash Die Back I suggest retention of self-set or coppiced Ash trees is inappropriate.

I suggest condition 3 should not be approved without more detail on size and provenance of trees in order to ensure that the landscaping scheme which is approved compensates for the previous loss of trees and shrubs and provides benefit for wildlife in line with planning policy CS1, CS3 and CS7 and TB23.

I don't recommend that condition 6 should be approved as the applicant has what not assessed what lighting is necessary provided and provides no detail of external lighting and fails to demonstrate that only downlighters or low level lighting will be used, what controls such as PIR will be installed. The drawing therefore doesn't demonstrate that lighting will not negatively impact wildlife or cause obstruction to bat tubes or boxes.

Summary

For the above reasons I can't recommend that conditions 3, 5 and 6 are discharged. No evidence is provided to demonstrate condition 7 was adhered to and the contractor was aware of the obligation for the precautionary approach.

I am happy to be reconsulted when details of bat tubes/boxes according to 222744 condition requirements and/or a Ecologist's report justifying alternative have been submitted, with a timetable of when evidence of installation and implementation will be.

Conditions & Reasons (if required)

Awaiting details of integral bat tubes and timescale for provision of evidence from an ecologist of installation, as well as details of a wildlife-friendly external lighting scheme.

Date:	19-09-24	Signed:	T Cuss
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Bat Tubes

BUILT-IN HABITATS N° 004

Woodcrete Bat Tubes

We recommend the use of woodcrete-type bat tubes that are manufactured by Habibat or Schwegler. These are a well known brands so are always accepted as a compensation measure for planning applications and Natural England Licence applications. The tubes also have a low visual impact on the development because they can be built into the exterior wall and then rendered or painted, or in the case of the Habibat, faced with brick or stone.

Recommended bat tubes



Habibat

The great advantage of the Habibat box is that it can be faced with brick, stone or render, so that it blends in and doesn't alter the aesthetic of the build.

Specifications

Height	44 cm
Width	21 cm
Depth	10 cm
Weight	7 kg



Schwegler 1FR & 2FR

There are two similar designs that we use regularly. The 1FR is designed to be used singularly whereas the 2FR has transverse connecting holes (model shown) that allow tubes to be connected together.

Specifications

Height	47.5 cm
Width	20 cm
Depth	12.5 cm
Weight	9.8 kg

How Many to Install

The number of bat tubes to install is dependent on the level of compensation or mitigation that is required. Typically one tube is recommended on sites where there are low number of bats and multiple groups of tubes are recommended on sites of high ecological significance.



Location

The tubes should be positioned at least 0.5m below the eave or gable apex to prevent predation by domestic cats. It is also recommended that where practical, the tubes are not positioned above windows or doors.

Installation

The tubes should be built into the exterior wall of the building, typically at the gable apex. The tubes should be installed flush with the surrounding wall and can then be rendered or painted with breathable paint if required.

Bat Tubes

Bat tubes are an excellent way to provide discreet and low impact roosting opportunities for certain species of bats that tend to occupy crevices within buildings. They are relatively compact and can be installed flush or beneath a rendered surface and can be painted with an air permeable paint if required.


crossman
ASSOCIATES

Written by Alex Crossman

01761 233414

hello@crossmanassociates.co.uk

Fire Engine House, Oakhill, Bath, BA3 5BJ