

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251539
Address:	354 Barkham Road, Barkham, Wokingham, RG41 4DE.		
Proposal:	Householder application for the proposed erection of a first floor upwards extension with new pitched roof and front facing gable, alongside a two storey rear extension with roof lights and associated alterations to front, side and rear fenestration, following removal of existing roof structure.		
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 (John Wenman Ecological Consultancy, Ref R2890_PRA_a) and Bat Emergence Survey (John Wenman Ecological Consultancy, Ref R2890_BES__a). I have also reviewed the plans and elevations submitted in support of the application.

All bat species are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, 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 PRA survey recorded a few of potential roosting features for crevice dwelling bat confined to rumbling ride and hip mortar and narrow gaps between timber barge boras on the half-hipped gables and front gable end. The unlined roof offered further services which evidence of roosting bats would be hidden. The Ecologist describes the site as set in countryside. Hedgerows/treelines provide flight paths to high-quality foraging areas, e.g. nearby woodland for bats roosting locally.

One emergence survey was completed on 30 April 2025 just before the optimal survey window. The Emergence Survey data search fails to include local planning history. The Common pipistrelle bat roost and moderate level of bat activity recorded in the neighbouring house, as well as local reptile records and results of ecological appraisals of land at Edneys Hill have not been taken into account.

The Ecologist has failed to make reference to the loss of biodiversity and foraging and commuting habitat caused by the treed hedgerow and woodland habitat clearance of the garden and the Owner's blue-line land. BS42020 section 6.4.8 states that where relevant, any survey report *"should also include reference to any evidence of material events occurring on site, either before or after ecological surveys have been carried out, for example:*

a) removal or management of vegetation, including trees;

b) alteration or loss of other biodiversity features, such as hedgerows, ponds, ditches or buildings and features of value to protected species;

c) control of weeds or other species.

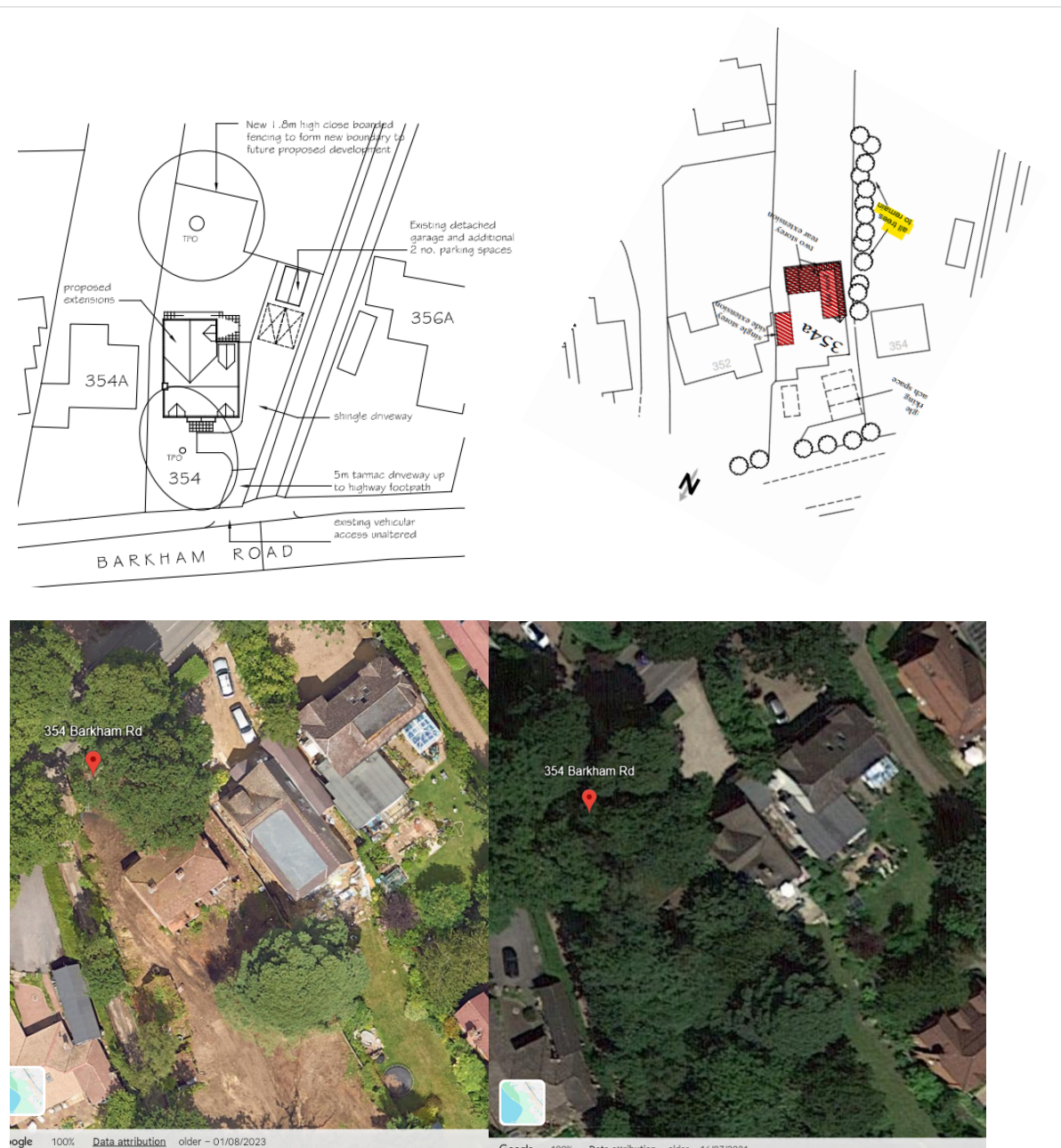
Such events should be described and the cause explained where known along with the implications, if any, for the main findings of the ecological report".

The cumulative and in-combination impacts of the degradation of priority habitat have therefore not been assessed, and no mitigation or compensation are currently proposed. I am concerned that the loss of the roost to the east and tree roosts in the garden and land to the rear of the house may increase the likelihood of disturbing bat and the need to compensate the potential roosting features to maintain bats on the site.

Policy CP3 states planning permission will be granted for proposals that have maintain or enhance the ability of the site to support fauna and flora including protected species. According to CP7 development which may harm habitats or, species of principle importance, veteran trees or features of the landscape that are of major importance for wild flora and fauna including wildlife corridors, whether directly or indirectly, or will be only permitted if it has clearly demonstrated that mitigation measures can be put in place to prevent damaging impacts. According to MDD TB23, planning permission will only be granted where the development ensures that all developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors, which shall be integrated and linked to the wider green infrastructure network. To maintain the high-quality foraging and commuting supports for bats and birds and invertebrates, the scrub, shrubs, southern boundary trees and hedgerows must be protected, and habitat loss on the site compensated.

Summary

To comply with the NPPF section 15 and local plan policies, an external lighting, tree protection and biodiversity enhancement conditions and informative I17 should be included in any planning approval.



Conditions & Reasons (if required)

Condition: Prior to the commencement of development details of biodiversity enhancements, to include bird boxes, tiles or bricks on and around the buildings and native species tree and shrub planting shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved.

Reason: To maintain wildlife and incorporate biodiversity in and around developments in accordance with paragraph 187 of the NPPF. Relevant policy: NPPF paragraph 198 and Section 15 (Conserving and Enhancing the Natural Environment), Core Strategy policies CP1, CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

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

Reason To ensure that bats a protected and priority species and wildlife are not adversely affected by the proposals. Relevant policy: NPPF paragraph 198 and Section 15, Core Strategy policies CP1, CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition CL7:

Reason: To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of biodiversity value and support wildlife. To allow for verification by the local planning authority that the necessary measures are in place before development and other works commence. Relevant policy: Core Strategy policies CP3 and CP7 Managing Development Delivery Local Plan policies CC03 and TB23

Bats are highly mobile creatures, and it is possible that protected species may be encountered.

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:	21/11/25	Signed:	T Cuss
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