

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252691
Address:	Moyle House, Fleet Hill, Finchampstead, Wokingham, RG40 4LJ.		
Proposal:	Householder application for the proposed erection of a First floor front extension. Two storey side extension. Two storey side rear extension following conversion of garage to create habitable accommodation. Changes to fenestration to include 2no. Juliet balconies. Raising of the roof to create more space on the first floor. Two storey rear extension to include rooflights. Plus erection of detached double garage following demolition of existing.		
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 Bat Mitigation Strategy 2025, Phase 2 Bat Emergence Survey (Dr J Denton, September 2025) and Preliminary Roost Assessment (Phase 1 Bat Survey) (Dr J Denton, July 2025). I have also reviewed the plans and elevations that have been 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 Preliminary Roost Assessment inspections recorded multiple gaps in the under-tile spaces that crevice-dwelling bats could exploit. The area has good foraging potential and further surveys were required to rule out or confirm the presence of

bat. According to the Bat Mitigation Strategy the initial internal survey undertaken in July identified the house had high potential for roosting bats.

Bat emergence surveys were completed on 8 and 29 August, and 19 September 2020. A total of five Common pipistrelle day roosts were recorded with a peak emergence count of four from the western hip roof area on 29 August. The Ecologist has concluded that as there are a number of bats roosting the site is of local value. I agree that a European Protected Species Licence would be needed to undertake the development proposed. If the application is approved, I consider it is not unlikely that Natural England would grant an EPS if a suitable mitigation strategy to ensure the favourable conservation status of bats in the area is maintained and like-for-like replacement roost features and timing restrictions are proposed.



Common pipistrelle roost locations

The survey effort and methodology are adequate. I am satisfied that the inclusion of integral roost spaces via bat access tiles on the southern elevations of the house is in line with CIEEM Bat Mitigation Guidelines, EPS licencing best practice and the requirements of the NPPF and WBC Local Plan policy.

Bat Mitigation Strategy 2025 summarizes that the method statement of works would include:

- Ensure NE licence in place;
- Establish bat boxes on site prior to any building works;
- Once scaffolding is established, provide a tool box talk (TBT) to all personnel on site, with regards to the legal protection of bats, what to do if a bat is found and method of works;
- Proceed with the hand removal tiles under ecological supervision;
- Any internal membrane felt also to be removed under ecological supervision;
- Hand removal of hanging tiles and lead flashing around dormers;
- Once all tiles are removed, and all features which can be utilised by bats have been cleared and the licence holder is happy, the remaining sections of the roof can be cleared without further involvement of the licenced ecologist;

All initial works, including removal of hanging tiles, roof tiles and felt, must be undertaken under the supervision of an ecologist.

If the application is approved, provided that submission of a copy of the EPSL and a biodiversity-sensitive external lighting condition are secured by planning condition, there are no ecological objections to the development as proposed.

Conditions & Reasons (if required)

Condition: No works shall commence until a European protected species licence for development works affecting bats has been obtained from Natural England and a copy of the licence and approved mitigation strategy, (or an email from Natural England that the site has been registered under a Bat Mitigation Class Licence) have been submitted to the council. Thereafter the approved mitigations measures shall be maintained in accordance with the approved details.

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

Condition: 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 198 Section 15 (Conserving and Enhancing the Natural Environment), Core Strategy policies CP3, and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: At no time shall any forms of external lighting be installed on the site or affixed to any buildings on the site without the prior written approval of the local planning and unless it is in accordance with the recommendation Guidance Note 08/23 Bats and Lighting at Night (BCT/ILP).

Reason To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 198 Section 15 (Conserving and Enhancing the Natural Environment), Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Date:	22/01/26	Signed:	T Cuss
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