
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252634
Address:	44 Proctors Road, Wokingham, Wokingham, RG40 1RP.		
Proposal:	Householder application for the proposed double-storey front, side and rear extension, single-storey rear sunroom, changes to fenestration, insertion of 1no. roof lantern and 2no. rooflights.		
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 (Leigh-Ann Barran Ecology, Ref 25045, 10 July 2025) and the Owner's email. I have reviewed the plans and elevations submitted in support of the application as well as local planning history and relevant local bat survey records.

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 for derogation from the regulations from Natural England.

The external inspection identified several features which could support bats. Prominent gaps were present between the soffit box and fascia on the front and rear elevations, providing direct access into the roof void and the cavity walls. Daylight was visible through gaps in the felt indicating possible access points. Gaps and crevices were observed in the gable wall, including where mortar was missing between bricks, creating cavity area suitable for roosting bats. The junction between the garage and the main house exhibited gaps in the mortar, which could provide further access points for bats or facilitate movement between structures. I support the ecologist's conclusion that the building has moderate suitability for roosting bats. The range and distribution of features, coupled with a low level of internal

disturbance and the building's structural condition, indicate that at least two dusk emergence surveys between May and August.

The observations made by the owner were not carried out in line with the bat survey Good Practice Guidelines 4th Edition and do not confirm the absence of roosting bats. As advised by Leigh-Ann Barren, emergence surveys need to be carried out at least 3 weeks apart and two surveys should have been completed in the optimal survey period between May and the end of August.

According to the owner the surveys took place on 18 to 20 September between 20.00 and 21.30. Sunset was at 19.10 on 18 Sept, and 19.05 on 20th. The surveys did therefore not until at least 50 mins after the Good Practice Guidelines table 8.2. recommended start time of sunset. The crevice-dwelling Common and Soprano pipistrelle are both early emerging species and, dependent on habitat can forage up to half an hour before dawn and dusk.

The edition 3 of the Good Survey Guidelines recommended dusk emergence survey start (earlier still) at **15 minutes before sunset**, and that dawn re-entry surveys start 1.5 to 2 hours before sunrise and end 15 minutes after sunrise. Sunrise was at 6.43 on 18 September. However, the Owner's survey started at 04.15 it ended at 05.30, one-and-a-quarter hours before sunrise. Thus, any bat re-entering a roost between 5.30 and 7am would not have been seen by the Owner. The Owner does not confirm they used any bat detectors, recording equipment, or night vision aids, nor where they were positioned. So, it is unclear how they could have observed bats in the dark. The Good Practice Guidelines edition 4 no longer recommend dawn re-entry surveys due to the variability in roost re-entry times between species "*such that returning bats can easily be missed*".

For all the above reasons the Owner's survey cannot be relied on to conclude that bats are not using the potential roosting features and access gaps recorded by the professional licensed Ecologist.

Circular 06/05 states that: "*It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted*". There are no exceptional circumstances in this case, and the extent to which bats would be affected the proposal for a 2-storey extension has not been established.

WBC Local Plan policy CP3 states planning permission will be granted for proposals that demonstrate how they will (d) maintain or enhance the ability of the site to support fauna, including protected species. CP7 requires that development which may harm species of principal importance, whether directly or indirectly, will only be permitted if mitigation measures can be put in place to prevent damaging impacts or compensation measures are provided.

In the absence of any mitigation proposals and surveys which demonstrate bats will not be negatively affected and roosting features will be maintained, the development should not be approved. I advise the application is refused on grounds of lack of ecological information in accordance with the NPPF, circular 06/05 and Local Plan policies CP3 and CP7.

Conditions & Reasons (if required)			
N/A			
Date:	04/12/25	Signed:	T Cuss