

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	261182
Address:	12 South Drive, Sonning, Wokingham, RG4 6GB.		
Proposal:	Householder application for the proposed erection of a two storey front and side extension, part single storey part two storey rear extension, single storey rear extension with pitched roof, erection of terrace, garage conversion to create habitable accommodation plus changes to fenestration and erection of front gates.		
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 Consultant, Ref R3190_PRA_a, April 2026), and Great Crested Newt Habitat Assessment (Joh Wenman, R3143_GCN_a, April 2026) and reviewed the plans and elevations submitted in support of the application.

A bird was heard nesting above the eastern chimney. All wild birds are granted legal protection under the WCA 1981 (as amended). This legislation protects the birds, their eggs and nests whilst being built or in use.

All species of bats are protected under The Wildlife and Countryside Act 1981 (as amended) and The Conservation of 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. Under this legislation the UK is obliged to fully take into account bats within the planning process and the level of bat activity on-site must be fully assessed prior to the assessment the planning application.

The PRA inspection carried out on 1 April 2026, identified several features which could provide opportunities for crevice-dwelling bats. These included raised and

uneven roof tiles, gaps in ridge and verge, gaps behind uneven hanging tiles and between overhanging timber eaves and walls. The quantity of raised and uneven roof tiles, particularly those running along the verges, the uneven hanging tiles, gaps in the ridge and verge mortar and gaps between the overhanging timber soffit and wall, could lead to potential roosting sites for crevice dwelling bats between the timber sarking, bitumen liner and roof tiles, such as the common pipistrelle (. Evidence of crevice-roosting species is typically hidden from view in areas such as gaps between tiles and internal linings/insulation. The Ecologist notes it is not always possible to inspect all potential roost sites, particularly for roost in hidden crevices. Therefore, an absence of bat evidence found during a survey does not necessarily equate to evidence of bat absence in a building.

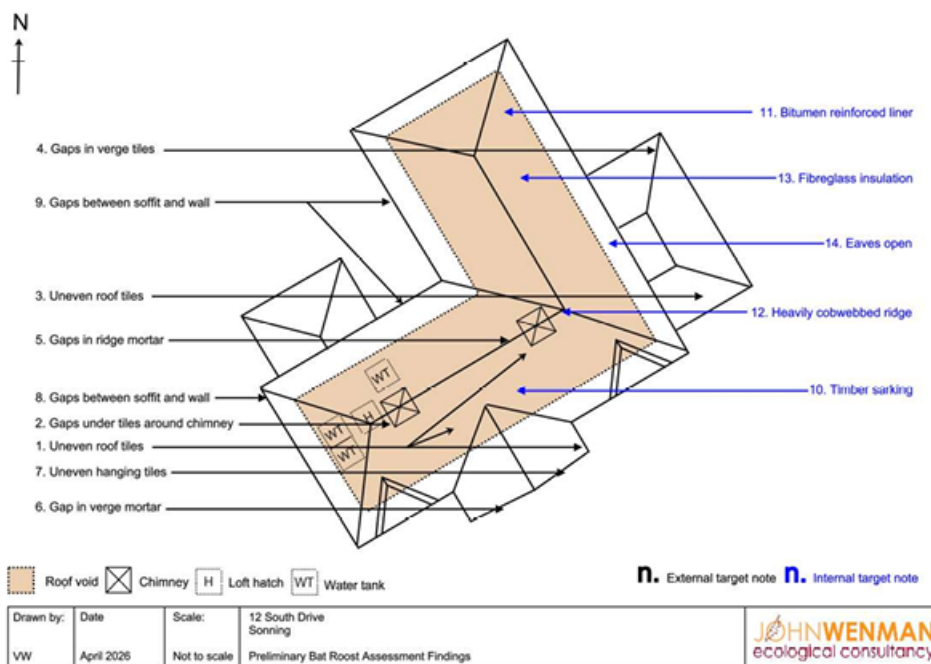


Figure 1. Preliminary Roost Assessment findings plan.

12 South Drive, Sonning - Preliminary Roost Assessment (S3190_PRA_a)
- 16 -

I note the PRA desk survey did not include local bat group or record centre bat roost data. The planning history search failed to include the record for a potential bat emergence from 12 South Drive recorded in 2020 (Ref 200757), as well as the bird and/or bat boxes which the LPA previously secured at 12A South Drive. In addition, local records include multiple roost records on Bath Road to the south, Sonning Meadows to the north as well as roosts to the west on South Drive.

While the number of local roosts has not been fully considered, I agree with the Ecologist's conclusion that the shed has negligible potential, and the house has moderate potential suitability. The development proposals will directly impact several potential bat roosting features and could lead to direct and/or indirect disturbance, injury or death of bats. I agree that further surveys needed a minimum of two dusk emergence survey need to be undertaken in the period of May to August to determine the impact of the proposals on protected species. If the emergence surveys record roosting bats, further surveys will be required to characterise the roost and inform an impact assessment and mitigation strategy. I broadly support the recommended mitigation and enhancement set out in PRA section 8.

Paragraph 99 of the government Circular 06/05: *“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”*. There are no exceptional circumstances in this case, and the emergence/roost characterization surveys recommended in Section 1.1.4, 7.2.1 and 8 must be provided with detailed mitigation proposals before the application can be approved.

According to national and local validation guidance features such as trees and hedgerows should be shown on the Site Plan. However, the Block Plans are not annotated, and the detail of the existing front hedge is not shown. The PRA states the *“connected private gardens and linear trees... provides continuous habitat that could be used as bat flight paths and foraging habitat, connecting to additional high-quality foraging habitats in the nearby area, for any bat(s) roosting in the property”*. The GCN Habitat Assessment also describes *“scattered trees, hedging species and scattered shrubs around the boundaries of the house”*. Therefore, the application form has been completed incorrectly there are trees and hedges on site and withing falling distance and the proposals will affect the existing car parking arrangements.

The removal of the front boundary hedgerow and trees to facilitate installing a wider gate and replacement wall has not been justified. I can't support removal of the front hedgerow and trees, or loss of hedgelines on both the southwest and northeastern boundaries which are contrary to policy. In the absence of details on the Block Plan or PRA of the existing hedgerow trees and biodiversity habitat, including the front and rear lawns and shrub beds it is not possible to safeguard biodiversity habitat, assess the impact of increased car park and mitigate and compensate the habitat for wildlife including foraging and commuting bats. Confirmation should also be provided whether there is a pond in the back garden.

The Site Plan should be amended to show existing boundaries, hedgerow, trees and natural features and all the features proposed to be retained. I recommend that the design of the wall and gate and increased/ parking are reviewed, the biodiversity mitigation hierarchy is applied, and the loss of biodiversity habitat and a wildlife corridor is retained along the front boundary and at least one side of the Site to maintain connectivity and foraging and commuting routes. The description of the development proposals and the Block Plan are amended to include changes to the roof and proposals to remove both chimneys.





I note the Ecologist failed to refer to the existing floodlight and the impact of artificial lighting on bats and birds. In line with the Good Survey Guidelines, the impacts of external lighting should be assessed in the roost characterisation survey report and appropriate mitigation measures to avoid and reduce negative impacts on light pollution on wildlife include in the additional submissions. Full details of all compensation agreed with the applicant should be included in the mitigation strategy proposals in the emergence survey report that must be submitted prior to determination of the application.



Conditions & Reasons (if required)

Awaiting bat emergence surveys and detailed mitigation proposals, update to the description, and amendment access arrangement to minimize loss of hedgerows and trees, and the site plan to show hedges and trees retained where possible.

Date:	2/6/26	Signed:	T Cuss
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