

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252740
Address:	65 Evendons Lane, Wokingham, RG41 4AD.		
Proposal:	Householder application for the proposed loft conversion with 1no. roof dormer and 1no. rear Juliet balcony, rear extension, front porch, carport, garden outbuilding, 1no. rooflight, electric front gates and changes to fenestration.		
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 (Arbtech, 8 October 2025) and reviewed the submitted plans and elevations.

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 external inspection recorded weathered clay tiles, missing roof tiles on the eastern elevation, lifted tiles on the southern, eastern and northern elevations. The ridge tiles were raised on the eastern elevation. There are small gaps between the soffit boxes and brickwork.

I agree with the executive summary that the house has moderate value for roosting bats due to the missing tiles, lifted tiles lifted ridge tiles, and gaps behind soffit boxes. I agree that the application cannot be approved until at least two bat emergence survey completed between May and August have been undertaken and a mitigation strategy has been submitted. The owner must be aware that undertaking any works

to the roof, chimneys or soffits, or may disturb bats or would obstruct or destroy roosts and could cause an illegal without a European protected species mitigation licence.

I note the desk top survey does not include local records centre of bat group records. The design of the emergence surveys should take account of the bat roost recorded with in 25m of the site on the south side of Evendons Road and relevant records and enhancement proposals. In line with survey Good Practice Guidelines the impact of the existing pollution from existing floodlights as well as the need to maintain and provide enhancement for wildlife and therefore mitigate the adverse impacts need to be addressed in the emergence survey report.



Government Circular 06/05: Biodiversity and Geological Conservation 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.”* In this case the extent to which bats would be affected by the proposals has not been established, and there appear to be no “exceptional circumstances”. Approval of the application would not be in accordance with the Local Plan Cores Strategy or the above guidance.

Summary

As the impact of the proposals on bats cannot be assessed before June 2026, lack of ecological information and failure to comply with CP1, CP3, CP7 and TB23 can be included in reasons for refusal.

Conditions & Reasons (if required)

Awaiting bat emergence survey, external lighting proposals and protected species mitigation strategy.

Date:	15/12/25	Signed:	T Cuss
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