
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	250905
Address:	Newlands Farm, Barn 1, Sindlesham Road, Arborfield, Wokingham, RG2 9JH.		
Proposal:	Application for Listed Building consent for the proposed erection of a single storey side and rear extension with 1 no. roof lantern.		
Type of Development:	Other Listed Building alteration or extension		
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 & Great Crested Newt Statement (John Wenman Ecological Consultancy, Ref R22893_PRA_a, March 2025). I have also reviewed the Heritage Assessment Design and Access Statement, plans and elevations submitted in support of the application.

All species of British bat 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. 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 recorded small numbers of bat droppings resembling those typically deposited by Pipistrelle species on the lead flashings at the bottom of the weatherboarding on the western gable with a potential ingress behind the flashing and underneath the eave-overhang where the weatherboard was lifted. At least another 20 small bat droppings were caught behind the flashing at the bottom of the weatherboarding on the rear gable. I agree with the Ecologists conclusion that the property can be classified as a confirmed roost of high suitability as the conditions are suitable for a maternity colony. As the proposals would lead to the loss of features and directly affect the rear gable a survey to characterize the

roost provide a mitigation strategy to demonstrate that the favourable conservation status of bats using the property will be maintained.

Government 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 will be affected by the proposals has not been established, therefore determination of application would not be in accordance with the above planning policy.

The application must not be approved until the bat surveys, impact assessment and mitigation strategy proposed in PRA section 7.1 has been submitted. The design of the roost characterization survey should be informed by a Berkshire & South Buckinghamshire Bat Group and/or TVERC data search and the high potential for the neighbouring barns to support bat roosts. The report should be prepared in line with Good Practice Guidelines ed 4, and 2023 UK Bat Mitigation Guidelines.

I support the Indicative Mitigation Strategy and GCN Enhancement Opportunities which must be included in the development proposals and bat roost characterization report. To take account of the bat roosts, I recommend that the designs are amended and no lantern or skylight which could cause obstruction to roosting features and deter bats from using flightlines and commuting routes are included. I note no Tree Survey has been submitted with the application and the PRA report did not assess the impact of the potential removal of the western boundary hedge.

Summary

The application should not be determined until the three further emergence surveys proposed in section 7.1, and a detailed protected species mitigation and enhancement strategy are submitted. I recommend the extension designs are amended, and landscaping and external lighting details submitted to ensure the proposals maintain and enhanced wildlife in accordance with planning policy.

Conditions & Reasons (if required)

Awaiting bat emergence survey and bat mitigation strategy, amended plans, and a biodiversity sensitive lighting strategy.

Date:	30/04/25	Signed:	T Cuss
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