

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 reviewed the plans and elevations submitted in support of the application.

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 a number of 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 must be completed in accordance

with the bat survey Good Practice Guidelines 4th Edition to establish presence or likely absence

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”*. In this case, since 1) the extent to which bats (which are a protected species) may be affected by the proposals has not been established, and 2) there appear to be no “exceptional circumstances”, the application would not be in accordance with planning policy.

Summary

The house has a number of features suitable for use by crevice-dwelling bats. Further surveys are needed to confirm presence or demonstrate absence of roosting bats. The application must not be approved until the surveys have been submitted and the results, including any necessary mitigation proposals have been submitted to the council. If this information is not provided, the application may be refused on the grounds that insufficient information has been provided for the council to determine the likely impact of the proposals upon bats, which are a protected species and material consideration in the planning process and failure to comply with policies CP3 and CP7.

Conditions & Reasons (if required)

Awaiting bat emergence surveys and mitigation proposals.

Date:	02/12/25	Signed:	T Cuss
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