

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252040
Address:	82 Wargrave Road, Twyford, Wokingham, RG10 9PJ.		
Proposal:	Householder application for the proposed erection of single storey rear and side extension and rear balcony, following demolition of existing conservatory, replacement dormer to front, replacement fascias, soffits 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 Ecological Survey Report (Urban Tree Expert, Ref SPH/BAS-25/31.07, 12 August 2025) and reviewed the plans and elevations submitted in support of the application. I have also reviewed local planning history including ecological assessments.

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 kill or injure a bat or interfere with any roosting or resting site. 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 initial daytime inspection visit was carried out by Simon Holmes on 27 May 2025. The desk study completed by UTE did not include an assessment of Environmental Records Centre or the bat group and local planning history. Local bats roosts on Wargrave Road, Longfield Road, and Salix Gardens as well as protected species including Stag beetle (*Lucanus cervus*) have not been considered in the assessment of impact of the partially development on wildlife and species of principal importance.

During the external inspection the ecologist recorded that all the slate tiles on the front elevation cross-pitched roof with dormer window had recently been replaced

and the front section of roof under a tarpaulin and battened in the process of being re-roofed. During the internal inspection a number of the droppings were observed both under the ridge in the main loft void and on the floor of the dormer room beneath two recently removed ceiling lights. The internal inspection confirmed that roof tiles that had been laid with a breathable membrane which can cause entanglement and death of bats. The Biological Report in appendix 1 states that due exposure to sunlight light etc or due to contamination or presence of large quantities of PCR inhibitors, SureScreen Scientifics were unable to determine the species of the droppings.

Common pipistrelle, Soprano pipistrelle, and Noctule bats, were recorded and identified foraging and commuting around the site during emergence surveys conducted by Nick Powell with a remote camera on 6 June, 6 July and 31 July 2025. The external inspection and figures show that the soffits and ridge tiles of the dormer room were sealed tight with no gaps or missing mortar, and the main loft had been reroofed on 27 May 2025. However, paragraph 7.2 states that the property has features suitable for crevice dwelling bats. I am not satisfied that the emergence survey completed after the destruction of the bat roost/s rule out the presence of bat roost/. It appears that most or all potential roosting features had previously been removed or obstructed. There is no evidence that any potential access gaps were in retained in the same areas where droppings were recorded. I consider that, to ensure that there is no loss of bat roosts, and the populations at 82 Wargrave Road are maintained, compensation roosting opportunities must be secured in line with planning policy.

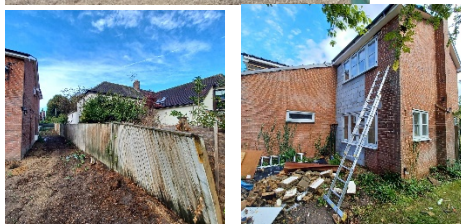
The Ecological Survey Report states the rear garden has been cleared site and the site comprises a gravelled front driveway/parking area with lawn, flower bed, hedgerows and shrubs on the boundaries which provide some foraging and commuting habitat for bats. However, the site visit photographs taken on 4 September 2025 show that the boundary hedgerows and shrubs have also been removed. The Survey Report does not quantify the loss or propose compensation which has been agreed with the applicant for the impact of tree, shrub and herbaceous vegetation clearance which occurred prior to 27 May 2025 and since 31 July 2025.

To compensate for the bat foraging habitat which has been cleared and ensure maintenance and enhancement of the bat populations, I advise that a landscaping condition should be secured. According to NPPF paragraph 187 d), planning decisions should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and incorporate features which support priority or threatened species such as swifts, bats and hedgehogs. According to Local Plan policy CP3, planning permission will be granted for proposals that d) maintain or enhance the ability of the site to support fauna and flora including protected species. Development proposals will be required to demonstrate how they have responded through the submission of clear and informative plans, elevation and streetscenes. I consider that unless a bat tube or box that provide a replacement feature for void-dwelling bats is incorporated into the dwelling and/or retained mature trees. Any remaining gaps which could provide access to the roof voids that have been fitted with breathable membrane that could ensnare bats should be repaired.

While I agree with the Ecologist that because no bats were seen emerging from or returning to the property to roost, this does not mean that they will not be present in the future as bats are known to be transient and use a wide variety of crevice like features opportunistically. In the absence of replacement roosting opportunities the development, I disagree that the development would not negatively impact bats, and that no mitigation or compensation are needed to comply with the NPPF and planning policy.



Figure 2. Rear garden. 82 Wargrave Road, Twyford. 27.05.25



Conditions & Reasons (if required)

Condition: Prior to the commencement/re-commencement of development there

shall be submitted to and approved in writing by the local planning authority a protected species mitigation scheme (including a timetable for its implementation) to include bat cavity box integrated into the building and crevice box on or around the building, enhancement for Stag beetle and invertebrates, and native and wildlife-friendly tree and shrub planting. The scheme as approved shall be implemented in accordance with the approved timetable. The biodiversity enhancements shall thereafter be installed, implemented, maintained and permanently retained as approved. **Reason:** To incorporate biodiversity and ensure that protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF paragraph 198 and Section 15 Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition CL4 Prior to the commencement/re-commencement of development there shall be submitted to and approved in writing by the local planning authority a scheme of landscaping, which shall specify species, planting sizes, spacing and numbers of trees/shrubs to be planted, and any existing trees or shrubs to be retained.

Planting shall be carried out in full accordance with the approved details in the first planting and seeding seasons following the grant of planning permission. Any trees or plants which, within a period of 5 years of the occupation of the extension building in the case of retained trees and shrubs) die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species or otherwise as approved in writing by the local planning authority.

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition CL6

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: At no time shall external lighting be installed on the site or affixed to any buildings on the site without the prior written approval of the local planning. All external lighting must be designed in accordance with Institution of Lighting Professionals 'Guidance Note 08/23 Bats and Artificial Lighting at Night' shall be submitted to and approved in writing by the local planning authority clearly demonstrate that any areas to be lit will not disturb or negatively impact biodiversity. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF paragraph 198 and Section 15 Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Date:	20/10/25	Signed:	T Cuss
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