

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260388
Address:	Sunnyleigh, Sandhills, Knowl Hill, Wokingham, RG10 9XX.		
Proposal:	Householder application for the proposed garage conversion to create habitable accommodation, new pitched roof over front extension along with 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 (John Wenman Ecological Consultancy, Ref R3166_PRA_A, April 2026) and reviewed the plans and elevation submitted in support of the application. I have also reviewed local planning history and ecological records including Bat Emergence Survey (John Wenman Ecological Consultancy, R2980_BES_a, September 2025).

All bat species found in the wild are fully protected under The Wildlife & Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 (as amended). The legal framework underpinned by the WCA and Habitat Regulations makes these specific actions an offence as follows:

- Deliberately kill, injure, capture or take a wild bat;
- Deliberately, intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, to rear or nurture their young, to hibernate or migrate, or to significantly affect local distribution or abundance;
- Damage or destroy a place used by a bat for breeding or resting; and
- Intentionally or recklessly obstruct access to any place used by a bat for shelter or protection.

A bat roost is interpreted as *“any structure or place used for shelter or protection”* whether or not bats are present at the time.

During the internal inspection on 25 March 2026, 150-200 small and medium bat droppings were observed in the roof void with concentrated clusters at the gable ends as well as scattered droppings on the insulation. There were also multiple bat access points leading to potential crevice roost sites under the waney-edge boards and hanging tile cladding on the front and rear gables and the side entrance porch. These features could provide sufficient space, shelter, protection and conditions for regular use by individual or groups of crevice dwelling bats.

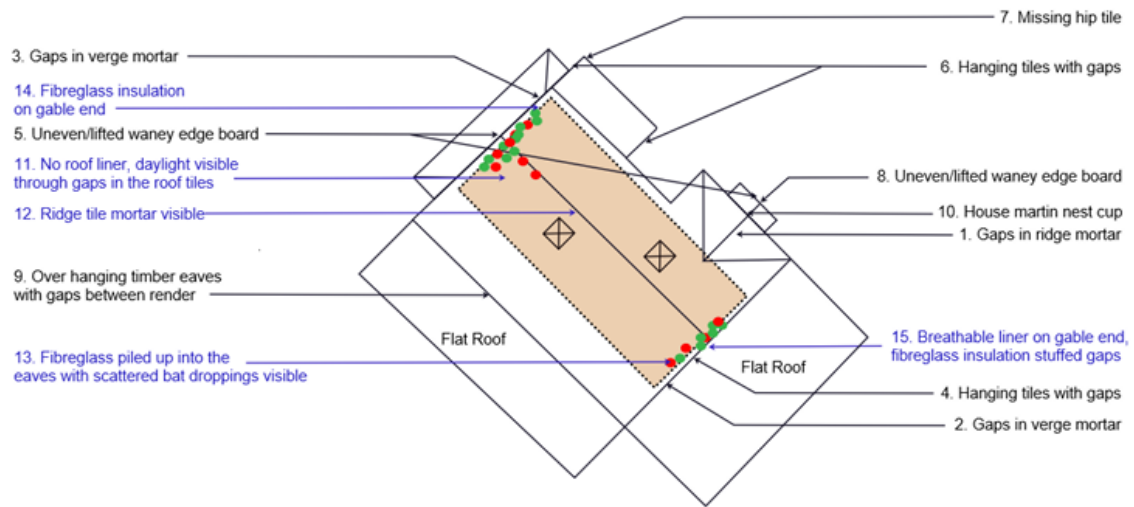
I agree that the surveys indicate that the property is used by both void- and crevice dwelling bats such as Common pipistrelle and Brown long-eared bats. R2980_BES_a for Homeleigh immediately to the east, recorded several Common pipistrelle emerging from the front of Sunnyleigh in August 2025. I support the assessment that the house has High bat roost potential.

The development proposals have not been amended to retain the waney-edge boards and hanging tile cladding, therefore development will directly impact the roosting and access features identified by the Ecologist. The bat roost features and access gats will be lost and be available to roosting bats in the long-term. Revised elevation drawings have not been submitted to the LPA Therefore, the proposals have not been amended as stated in PRA paragraph 7.1.3 and the loss of access and high quality roosting opportunities would be likely to contravene the legislation protecting bats and their roosts. A European Protected Species (EPS) Mitigation Licence will be required to render the front gable end. I support the conclusions in paragraph 7.2.3 that three bat emergence surveys are needed to fully characterise the bat roosts in the property and undertake a full impact assessment and mitigation proposals.

PRA section 3.2 refers policy in Government Circular 06/2005 advising that in instances where there is a reasonable likelihood of bats being present and affected by a development, surveys must be undertaken to inform a mitigation strategy to be agreed prior to granting planning permission. Paragraph 99 states: *"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 there are exceptional circumstances so approval the application would not be in accordance with planning policy and the compensation and enhancements required by Local Plan policies CP3, CP7 and MDD TB23.

I will be happy to comment when a bat roost characterisation survey and detailed mitigation proposals have been submitted. If the plans are not amended and no further bat surveys are submitted the application may be refused on grounds of lack of ecological information and failure to comply with the NPPF and Local Plan policy.

PRELIMINARY ROOST ASSESSMENT FINDINGS



Roof void
 Chimney
 Medium-sized bat droppings
 Small-sized bat droppings

External target note
 External target note

Drawn by:	Date:	Scale:	Sunnyleigh Sandhills
VW	April 2026	Not to scale	Preliminary Roost Assessment Plan

JOHN WENMAN
 ecological consultancy



SUNNY LEIGH SANDHILLS, KNOWL HILL, BERKS. RG10 8XX	ERICA FORISKY Scale: 1:100 @ A3 Date: Feb. 2026 Drawing No: K-H-322
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Scale in metres



ERICA FORISKY
1:100 @ A3 Date: Feb. 2026

Conditions & Reasons (if required)

Awaiting bat emergency surveys and mitigation proposals.

Date	20/04/26	Signed	T Cuss
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