

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251821
Address:	67 Ellis Road, Crowthorne, Wokingham, RG45 6PP.		
Proposal:	Full application for the proposed erection of 1no. replacement dwelling and bike store, following demolition of existing dwelling and garage.		
Type of Development:	Minor Dwellings (1-9)		
Site Visit Made:	Yes/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 reviewed the Design, Access and Planning Statement (Aves Architectural, July 2025) plans and elevations submitted in support of the application as well as the site planning history.

The application is not supported by a Bat roost assessment or biodiversity report. The Preliminary Bat Roost Assessment (John Wenman Ecological Consultancy Ref R714/a) December 2013) which was commissioned in support of planning application 131265, assessed that the mature gardens on the northern and southern sides of Ellis Road provide potential foraging opportunities for bat species associated with suburban habitats. Two gaps were recorded, one in mortar of one ridge tile and one under the tile just above the chimney. The report concluded that in 2013 in the absence of any evidence and due to the lack of roosting opportunities for bats to the exterior of the building, the planned work was highly unlikely to have any impact on bats or their roosts.

The condition of the property and the features that could provide potential access opportunities for bats are likely to have changed in 12 years. The property has not been recently surveyed, and it is therefore not possible to confirm the absence of bats in the property.

All species of bats receive special protection under UK law and it is a criminal offence under the Wildlife and Countryside Act 1981 (as amended) and The

Conservation of Habitats and Species Regulations 2019, 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 Natural England.

If bats or bat roosts are present the demolition would cause illegal disturbance and negative impacts to bats if either crevice-dwelling pipistrelles (*Pipistrellus* spp.) and small *Myotis* species or access to an enclosed roof space suitable for long-eared bats (*Plecotus* spp.) are resident or opportunistically use any such features in the property. If a bat roost will be affected by the works, a licence for development works affecting bats (i.e. for derogation from the provisions of the Habitat Regulations). This involves submitting a licence application to Natural England with a detailed mitigation plan informed by surveys undertaken in accordance with national guidelines.

I therefore recommend that the Bat informative should be included in any planning permission, to remind the Owner and their contractor of the legal protection given to bats and the need to consider commissioning a suitably qualified ecologist to undertake a pre-commencement bat check and apply precautionary measures in carrying out the proposed works.

The Design, Access and Planning Statement states that *“There is not considered to be any significant ecological value attached to the site at present however ecological enhancements such as bat or bird boxes, log pyramids and additional tree planting could be secured by means of an appropriately worded condition of consent”*. In accordance with Local Plan policies CP3, CP7 and MDD TB23 and paragraph 187 of the NFFP I request and biodiversity enhancement condition.

Conditions & Reasons (if required)

Condition: Prior to the commencement of development full details of the schedule of biodiversity enhancements, to include incorporation of bird boxes, Habitat bat bricks or tubes integrated into the new buildings and native and wildlife friendly landscaping and a timetable for implementation shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be implemented and maintained as approved. Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.

Reason: To ensure that biodiversity enhancements area incorporated in accordance with paragraph 187 of the NPPF Relevant policy: Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy around TB23.

It is possible that protected species may be encountered once works commence. I recommend the following informative should be appended to any such consent:

Informative: Bats are a protected species under the Conservation of Habitats and Species Regulations 2017 (as amended). Should any bats or evidence of bats be found prior to or during the development, all works must stop immediately, and an ecological consultant contacted for further advice before works can proceed. All contractors working on site should be made aware of the advice and provided with the contact details of a relevant ecological consultant.

Informative: This permission does not convey or imply any approval or consent for protected species required under the Wildlife and Countryside Act 1981 (as

amended) and Conservation of Habitats and Species Regulations 2017 (as amended). The applicant is advised to contact Natural England with regard to any protected species that may be found on the site.

Date:	13/11/25	Signed:	T Cuss
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