

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	261498
Address:	Sonning House, Pearson Road, Sonning, Wokingham, RG4 6UL.		
Proposal:	Householder application for the proposed erection of a single storey rear extension and a first floor rear extension, addition of 3 no. dormer windows, a balcony and external staircase, a pitched roof over the existing garage, changes to fenestration and modifications to roof plus new front railings and gate and associated landscaping to facilitate conversion of Sonning House and Weavers Cottage into one single dwelling, following removal of the existing single storey side lobby, rear bay window and front boundary wall; installation of a swimming pool and erection of an associated pool house.		
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 Bat Roost Survey, (Enims, Ref EC2010, July 2026), BS5837:2021 Arboricultural Impact Assessment & Method Statement (Tamla Trees, Ref 03925Rv3, July 2026) and Design Access Statement Rev A (Woldon, 27 July 2023). I have also reviewed submitted plans and elevations as well as the previous site bat surveys.

All British bat species are fully protected by the Wildlife & Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (The Habitat Regulations) (as amended). In summary, the legislation combined makes it an offence to:

- Damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a bat;
- Deliberately, intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair the ability of bats to survive, breed or

reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species;

- Deliberately kill, injure or take any bat.

All wild bird species, their eggs and nests are also protected by the WCA 1981 (as amended).

In 2023 bat roosts were confirmed in buildings B1 and B2 as well as the presence of many external features such as gaps under roof tiles, holes in soffit boxes and large loft spaces. Bat emergence / re-entry surveys indicated a small day roost supporting within the loft of B2 and a Soprano pipistrelle in B1 with access/egress points on the south elevation and possibly the north elevation. Common pipistrelle roost access/egress point was observed on the upper west corner of the south elevation. Low numbers of bats were observed emerging from the roosts, indicating day roosts of Local value. Mitigation measures proposed included as a minimum:

- Provision of compensation roosts suitable for pipistrelle species and brown long eared bats
- Ecological supervision of works impacting the roosts; and
- Timing of works which impacts bat roosts to avoid the sensitive bat hibernation period of November to February inclusive.

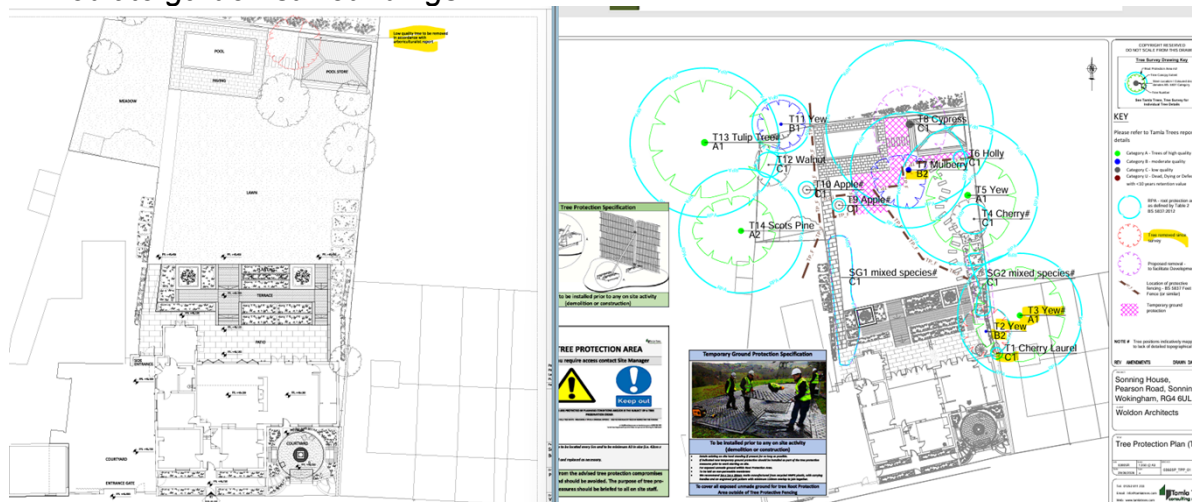
During the survey on 23 June 2026, five emergences were observed from beneath the eaves of B1 and B2, one from the north-eastern corner of B1, three from the western aspect of B1 and one from the southern aspect of B2. One possible soprano pipistrelle emergence was recorded from the roof on the north-eastern aspect of B1. High levels of bat foraging, socialising and commuting activity were recorded in the surrounding area, particularly within the garden to the north of Sonning House and along Pearson Road. During the survey, Soprano pipistrelle, Common pipistrelle, Noctule, Brown long-eared bat, Grey long eared bat (*Plecotus austriacus*), Serotine and all characteristics of Daubenton's bat and unidentified bats were observed using the surrounding area for foraging, commuting and socialising. High levels of foraging activity of Soprano pipistrelle were observed over the garden to the north of Sonning House. Bats were observed foraging and commuting along a flight path between B2 (Weavers Cottage) and the adjacent property to the east, as well as along Pearson Road.

I am satisfied the 2026 survey confirm the continued presence of roosting Common and/or Soprano pipistrelle in B1 and B2. DNA analysis of the bat droppings collected from B2 in 2023 identified as being from Brown long-eared bat. The brown long-eared roost in B2 loft void is still considered to be present. Roosts 4 to 9 are in different locations to those identified in 2023. I am satisfied that the survey effort and methodology are adequate and it is not unlikely that Natural England would grant a European Protected Species Licence necessary for the works proposed to be undertaken. I support the detail of the outline mitigation method statement provided.

There is potential for indirect impacts from insensitive lighting during construction and operation phases of the development. Lighting areas at night can deter bats from foraging and commuting, and illumination of roosts can interfere with bat emergence, cause bats to miss peak foraging periods, and lead to roost abandonment. If the application is approved submission and approval prior to

commencement of a biodiversity-sensitive external lighting scheme in line with the recommendations in section 4.3 must be secured by planning condition.

The Bat Roost Assessments do not include either the site plan or landscaping plans, and there is no reference to the Arboricultural Impact Assessment or Tree Protection Plan. I am concerned that the Ecologist has failed to assess the landscaping proposals and the impact of the construction of the swimming pool and pool house. I disagree that the landscaping is proposed to “*facilitate the conversion*”. I do not support their conclusion in section 4.2 that “*It is not anticipated that there will be physical fragmentation of bat commuting habitat or the loss of significant amounts of good quality foraging habitat*”. The loss of habitat to construct the pool and pool house, extensive terraces and patios are not considered and therefore I must disagree there the proposed works are only concentrated on the buildings “*and immediate garden surroundings*”.



I am concern that the Proposed Landscaping Plan is not consistent with the Tree Protection Plan and the loss of SG1, SG2 and T7 as well as climbers on the front elevation and shrubs on the west of the property and impacts to foraging and commuting are not proposed to be compensated. The Ecologist fails to consider the requirement under the 2024 NPPF to contribute to and enhance the natural and local environment by minimising impacts and providing net gains for biodiversity, including incorporating features which support priority or threatened species such as swifts and hedgehogs. According to the Local Plan Core Strategy policy CP3 planning permission will be granted for proposals that maintain or enhance the ability of the site to support fauna and flora including protected species. In the absence of enhancements for wildlife and biodiversity the development does not comply with planning policy.

In order to support approval of the application the landscaping proposals must be revised in order to provide enhancements for wildlife. The proposals are not consistent with the AIA and AMR and removal of A and B grade trees with roosting potential providing foraging and commuting routes and habitat for breeding birds is not justified. I disagree with Design Access Statement Section 2.4 that the proposals, particularly the impacts to and hard landscaping and herbaceous planting, increase biodiversity or enhances the ecological value of the site. “*An ecological survey of the Site has revealed there are a variety of habitats currently present near the site. Increasing biodiversity and enhancing the ecological value of*

the site is one of the aims of the design". The layers of planting which the Design Statement states separate the east and west wings would be removed by the unnecessary clearance of SG1 and SG2.

The AIA reports that T2 has been removed since determination of 230238. BS42020 6.4.8 states *survey reports should include reference to any evidence of material events occurring on site, "either before or after ecological surveys have been carried out, for example:*

a) removal or management of vegetation, including trees...

Such events should be described and the cause explained where known along with the implications, if any, for the main findings of the ecological report". However, the Bat Roost Survey Rev 2 fails to refer to the removal of the Yew T2.



According to the AIA appendix 4 only trees T6 and T8 would be removed in addition to SG1 and SG2. Mulberry T7 is described as *"not without character"* and no works are recommended by the Arboriculturist, however this is shown as removed in the Proposed Landscaping Plan. The Bat Roost Survey proposes compensation for its removal and the loss of wildlife corridors along SG1 and SG2

To reduce detrimental impacts to birds and bat commuting, swarming and foraging and compensate the loss of Yew tree T2 which was removed without discharge of 230238 pre-commencement conditions, I advise that the Proposed Landscape Plan is not approved. to retain foraging and commuting routes for bats where possible either SG1 and/or SG2 should also be retained. If the application is approved revised hard and soft landscape proposals that are consistent with the Bat Report, AIA AMR and the DAS should be secured by planning condition or submitted prior to determination to ensure retention of trees and shrubs in line with policy.

Summary

Provided that the Proposed Landscaping Plans are not approved and revised landscaping that is in accordance with the AIA/AMR are approved prior to commencement of development and planning conditions securing submission of the bat mitigation and EPS licence and a bat sensitive lighting scheme are secured there are no ecological objections to the development proposed.

Conditions & Reasons (if required)

Condition: No works shall commence until a licence for development works affecting bats has been obtained from the Statutory Nature Conservation Organisation (Natural England) and a copy of the licence (or an email from Natural England that the site has been registered under a bat mitigation class licence) and the approved mitigation strategy have been submitted to the council. Thereafter mitigations measures detailed in the licence shall be maintained in accordance with the approved details.

Reason: The building hosts a bat roost which will be affected by the proposals. This condition will ensure that bats, a group of protected species and a material consideration in the planning process, are not adversely affected by the development. Relevant policy: NPPF 2026 Section 19 (Conserving and Enhancing the Natural Environment), Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: Prior to commencement of development a site lighting design strategy for biodiversity designed in accordance with best practice including in accordance with Bats and Artificial Lighting at Night' Guidance Note GN 08 / 23 shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for bats and *birds* and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

Reason: The building hosts a bat roost which will be affected by the proposals. This condition will ensure that bats, a group of protected species and a material consideration in the planning process, are not adversely affected by the development. Relevant policy: NPPF 2026 Section 14 P3 and Section 19, Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition:

- a. No development or other operations shall take place except in complete accordance with the details within the Arboricultural Impact Assessment and Method Statement and Tree Protection Plan (Tamla Trees, Rev 03925Rv3) and dated July 2026 (hereinafter referred to as the Approved Scheme).
- b. No operations shall commence on site in connection with development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening or any other operation involving use of motorised vehicles or construction machinery) until the tree protection works required by the Approved Scheme are in place and inspected on site.
- c. No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within an area designated as being fenced off or otherwise protected in the Approved Scheme.

- d. The fencing or other works which are part of the Approved Scheme shall not be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery and surplus materials removed from the site, unless the prior approval in writing of the local planning authority has first been sought and obtained.

Reason: To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of biodiversity value to the area, and to allow for verification by the local planning authority that the necessary measures are in place before development and other works commence Relevant policy: Core Strategy policy CP3 and Managing Development Delivery Local Plan policies CC03 and TB23.

Condition: No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the written approval of the local planning authority. If within a period of **ten years** from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted at the same place, unless the local planning authority gives its written consent to any variation.

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 policies CC03 and TB23.

Condition: Prior to the commencement of the development, full details of both hard and soft landscape proposals designed in accordance with hedgerow planting and soft landscaping provided in section 4.4 of Bat Roost Survey V2 (Enims, Ref EC20210, July 2026) shall be submitted to and approved in writing by the local planning authority. These details shall include, as appropriate, proposed finished floor levels or contours, means of enclosure, car parking layouts, terraces, paths and patios, hard surfacing materials and minor artefacts and structure (e.g. refuse or other storage units, external services, etc). Soft landscaping details shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate, and implementation timetable.

Planting shall be carried out in accordance with the approved details in the first planting and seeding seasons following the substantial completion of the extension/conversion works, or in accordance with a timetable approved in writing by the local planning authority. Any trees or plants which, within a period of **ten years** after planting, are removed, die or become seriously damaged or defective, shall be replaced in the next planting season with others of species, size and number as originally approved and permanently retained.

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF Section 19, Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policies CC03 and TB23.

Condition: No buildings, enlargement or alterations no building, enclosure, pool, or container for the storage of oil or liquid petroleum gas shall be erected within the

curtilage of the dwelling house shall be carried out without the express permission in writing of the local planning authority.

Reason: To safeguard biodiversity and protected species. Relevant policy: NPPF Section 19, Local Plan Core Strategy policies CP3 and CP7, and Managing Development Delivery policies CC03 and TB23.

Informative on Breeding Birds

This permission does not convey or imply any approval or consent with regard to any protected species required under the Wildlife and Countryside Act 1981 for protected species. Trees, scrub and climbing plants are likely to contain nesting birds between 15 February and 15 September inclusive. Shrubs and climbers are present on the application site and are to be assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity on site during this period and has shown it is absolutely certain that nesting birds are not present.

Date:	19/08/26	Signed:	T Cuss
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