

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252252
Address:	L'Ortolan Restaurant, Church Lane, Shinfield, Wokingham, RG2 9BY.		
Proposal:	Householder application for the proposed erection of a rooftop extension with terrace decking to the existing main building, alongside alterations to the fenestration; the erection of a rooftop infill extension to the annex building; the erection of a detached single-storey garage with dual-pitched tiled roof and facing brickwork and stone/render to match the main dwelling; landscaping and parking alterations; and the demolition of the existing single- storey rear kitchen/service extension.		
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**
☒ Negotiate the amendments **stated below**; or
☒ Objection due to the reason(s) **stated below**

Comments On Proposal

I have read Preliminary Roost Assessment Report V1 (Roavr, Ref 25_PRA_06_69, August 2025), Arboricultural Impact Assessment (Roavr, Ref 25_5837_06_70), Design and Access Statement (Trace Architects), Heritage Statement Rev1 (Heritage Fusion, Ref 2067) and the Structural Feasibility Report (Vector Structures, September 2025). I have also reviewed the submitted proposal plans (Trace, Dwgs 1149 P01 – 30 September 2025) and Landscape Concept Plan (Colvin & Moggridge, Dwg 1509.01D 18 September 2025), and site and local planning history.

All bat species and their roosts are strictly protected UK legislation (Conservation of Habitats and Species Regulations 2017 (as amended) and The Wildlife and Countryside Act 1981 (as amended)). Under this legislation it is an offence to 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 from Natural England. 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 house B1 is assessed as having negligible bat roosting potential. The internal inspection of the roof void was limited to only safely accessible areas. The inspection of roof of the Annex B2 recorded slipped and lifted tiles, missing cladding around the eaves and possible gaps at the ridge line, creating several areas with potential for crevice-roosting bats. The eastern elevation had multiple PRFs and access gaps including a weathered ridge line, missing cladding beneath the eaves enhancing the suitability for crevice-dwelling bat.

The semi-sheltered interface on the western elevation of B2, has observable gaps at junctions between buildings and under roof tiling which can act as thermal refuges and potential entry routes. The Ecologist concluded that *“given the structural links with B1, ecological risk associated with this elevation remains moderate, warranting further investigative assessment where development may directly impact roof connectivity or wall interfaces”*. However, according to the Trace Architects Existing Site Plans, the house B1 appears to be separated from the Annex B2 by a vegetable garden.

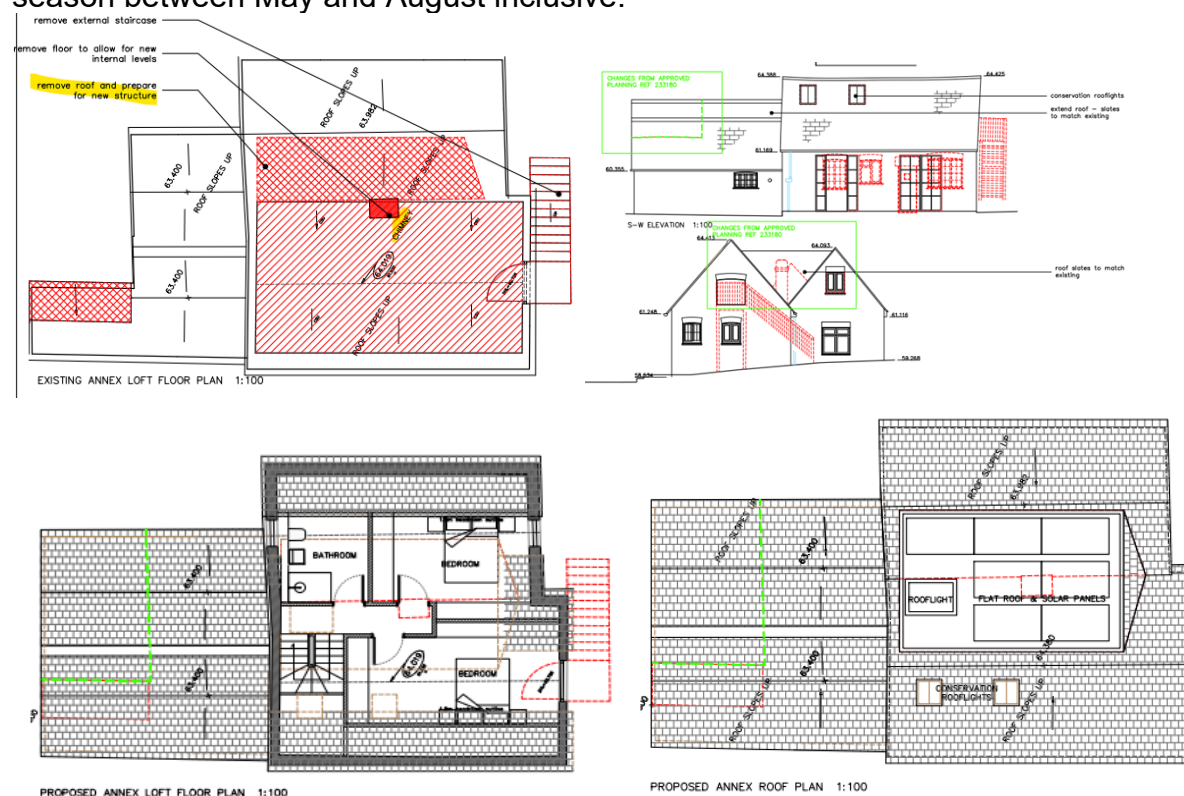
According to the Ecologist the site supports a mosaic of habitats that offer foraging opportunities for bats, particularly in the vegetated garden areas surrounding the buildings. Modified grassland interspersed throughout the garden provides additional foraging value, particularly where allowed to grow long and unmanaged along the site perimeter, supporting a diversity of moths, beetles, and other invertebrates. The site supports a number of mature and early veteran trees that hold PRFs suitable for bats.

Based on potential roosting features and the site’s good foraging habitat, and large trees with potential roosting features, I support the conclusion that building B2 is assessed as having moderate suitability for roosting bats. The Ecologist’s desk study did not include a local bat group or TVERC data search. The records for roosts and provision of mitigation and replacement roosts in the development immediately the northwest at The Manor, and the need to maintain favourable status of local bat populations, are therefore not considered.

I am concerned that up-to-date guidance is not being followed, and that the PRA refers to 2004 mitigation guidelines which were superseded by 2023 and then 2025 CIEEM UK Bat Mitigation Guidelines V1.2. I can however agree with the Ecologist’s conclusions in Section 5 and Section 7 of the PRA.

As shown in the submitted plans the development proposals include the erection of a rooftop infill extension to the annex building demolition of the existing single- storey rear kitchen/service extension. This would result in the loss of a number of potential roosting features identified, loss of roosts and potential injury and disturbance of bats if present. I must therefore disagree with the alternative suggested in Section 7.6. I am concerned the Ecologist has not assessed the current development plans, particularly Dwg 22, 23 and 24 that include removal of part of the roof and conversion of the loft with moderate roosting. The PRA report does not include any proposals plan drawings or a habitat map to identify the PRF in B2, landscaping which supports wildlife and which provide wildlife corridor links and potential foraging or the five trees with PRF which require further survey. I request that a habitat plan which identifies the Target Notes is provided or appended to the PRA.

Works including removal of chimneys, installation of roof lights, extensions, works to roofs, soffits and fascia are proposed to B2 which will disturb and/or destroy the potential roosting features recorded and foraging and commuting habitat. I disagree with the ecologist and the applicant's statement that *"the installation of bat boxes constitutes a proportionate and effective mitigation strategy, and further emergence surveys are not considered necessary"*. Moderate roosting potential is defined as *"one or more potential roost sites that could be used by bats due to their size, shelter, protection, appropriate conditions and/or suitable surrounding habitat but unlikely to support a roost of high conservation status"*. To determine whether roosting bats are using building, further bat emergence/re-entry surveys must be carried out. The site survey would require at least 2 separate survey visits by multiple surveyors. The bat activity must be carried out in accordance with the bat survey Good Practice Guidelines with at least one survey in the optimal period active season between May and August inclusive.



The PRA states that the site contains a good range of bat foraging resources including mature trees, managed hedgerows, modified grassland, and a small pond. Adjacent residential gardens and linear features enhance connectivity to the wider landscape. These features are suitable for insect-rich environments that support a variety of bat species. While the mitigation recommendations recommended by the Ecologist is that care must be taken to ensure that flight paths are not obstructed the PRA has not informed the landscaping proposals and contrary to local planning policy CP3, CP7 and TB23 the corridor on the west of the site which also links to off-site bat roosts is not retained and mitigation can not be secured by condition.

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, the extent to which bats may be affected by the proposals has not been established, and as there are no “exceptional circumstances”, the application would not be contrary to planning policy. Local Plan policies CP3 and CP7 are also not considered.

NPPF paragraph 187 (d) states that planning decisions should minimise impacts on, and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs. I therefore support including two additional bat tubes or boxes into the buildings or erecting them on trees.



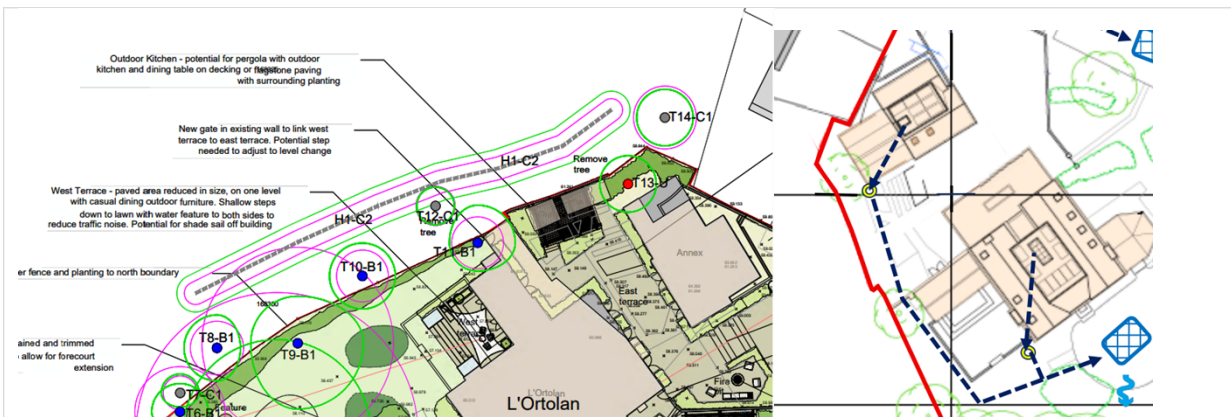
Photographic plate showing T13 (centre). (ROAVR, 2025)



Arboricultural and Landscaping Impacts

While the Ecologist assessed five trees for potential roosting features, it is not clear that the multi-stem ivy covered veteran Hawthorn T13 proposed to be felled has been assessed. While the PRA was written in August 2025, I am concerned the Ecologist has not assessed Arboricultural Impact Assessment (AIA) dated 17 July 2025. Currently the PRA report fails to take account of the loss of trees T13, T15, T17, T21, and part of G2 proposed in the Arboricultural Impact Assessment or removal of T11.

AIA section 4 is inconsistent with the Tree Assessment Plan 25_5837_06_70, and proposes the additional removal of Category B1 T11 *Gleditsia triacanthos* (Honey Locust). While both reports were prepared by the Roavr group, the tree species detailed in the AIA schedule are not consistent with the trees in the PRA. There are a number of *Gleditsia triacanthos* (Honey Locust) in the schedule but no *Robinia pseudoacacia* (Black locust) are listed by the Arboriculturist.



The AIA does not recommend that the removal of T11 is necessary or justify removal the tree. Annex Building Existing Plans and Elevations Drawing P07 demonstrates that the removal of T13 recommended by the Arboriculturist is not necessary. While the PRA was written in August 2025, I am concerned the Ecologist has not assessed Arboricultural Impact Assessment dated 17 July 2025.

I object to the landscape proposal to fell the Honey locust as this is not justified in the AIA. To avoid and reduce the impact of the development on bats and other wildlife I request T11 and T13 are retained. I request the amendment of the Landscape Concept Plan 15196.01 Rev D and Tree Assessment Plan 25_5837_06_70 to ensure that proposals for retention, protection, compensation and enhancement of landscape proposals are consistent with the recommendations of the Ecologist and works to trees which are adequately justified in an updated Arboricultural Impact Assessment.

The development proposals and proposals plans drawings are also not consistent with the Tree Assessment Plan. I am concerned that steps and other hard landscaping have not been take into account by the Arboriculturist. To ensure compliance with planning policy the proposals must be amended to take account of the need to retain and protect habitat connectivity, mature trees and valuable features with PRFs, and habitat for wildlife, to avoid and mitigate further indirect and direct impacts.

Existing and Proposed Lighting Impact

The Bat Survey Good Practice Guidelines advise that *“Current lighting levels and location should be noted to provide a comparison with new lighting proposals. Even one change such as an outside security light can have an impact and lighting needs to be considered in relation to current and proposed new bat access points”*. PRA recommends post-construction that the use of artificial lighting should be limited where possible. However, I am concerned that the Ecologist has failed to record the existing light pollution and advise the owner that the existing floodlights and external lighting may cause illegal disturbance and obstruction to bats. I advise the existing floodlights which have been inappropriately installed and angled above the horizontal are urgently amended to avoid light pollution and unnecessary nuisance and impacts on wildlife. If the application is approved a bird and bat-friendly external lighting scheme should be included in the revised submission or must be secure by condition.

Summary

In the absence of further survey which rule out or confirm the presence of bats or roosts in B2, I cannot agree that a non-licensed method statement would ensure that bats are not injured or illegally disturbed.

If works are limited to B1 and the new ancillary building, landscaping plans and development proposals are amended, T11 and the kitchen garden are retained and protected to maintain and enhance existing bat foraging and commuting and the potential roosts in B2, there would be no ecological objection. Unless all works to the kitchen garden, removal of Hawthorn T13 and Honey locust T11, installation of the outdoor kitchen and works to Annex B2 (including drainage) from applications 252252 and 252253 are omitted, I must object to the development proposals.

B2 has multiple PRFs and moderate likelihood of supporting one or more bat roost sites. All bats and roosts are legally and **no works** should be undertaken, or further applications made to the LPA, until further bat activity survey have been completed to confirm or rule out presence of roosts and assess the impacts of foraging and commuting of all site landscaping and construction work. A detailed mitigation strategy should be prepared to avoid, reduce and compensate for the cumulative direct and indirect effects, including a detailed external lighting strategy and revised landscaping proposals

If at least two emergence surveys carried out in accordance with best practice are not submitted with detailed mitigation proposals to ensure bats are maintained and enhanced on the site, the application may be refused on grounds of lack of ecological information and failure to comply with policy including CP3, CP7 and TB23.

I am happy to provide detailed comments on landscaping and enhancement measures to retain, protect and enhance wildlife and biodiversity during construction and the occupation phase when further bat surveys and revised tree protection, landscaping, lighting and proposals have been submitted.

Conditions & Reasons (if required)

Awaiting bat emergence surveys, detailed mitigation and enhancement proposals and a wildlife-sensitive lighting strategy.

Date:	27/10/25	Signed:	T Cuss
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