
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	253129
Address:	Oaklands Farm, Forges Lane, Finchampstead, Wokingham RG27 0RB.		
Proposal:	Householder application for the proposed extension, alteration and remodelling of property, including raising the roof and additional first floor, along with single storey rear, and two storey side/front 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**
☐ Objection due to the reason(s) **stated below**

Comments On Proposal

I have read the Preliminary Roost Assessment (KJF Consultancy, Ref PRA.V1.D.G.OF.NMR.E.H, 3 August 2025) and Bat Survey Report (SR.V1.D.OF.NMR.E.H, 23 September 2025). I have also reviewed the Planning Statement and the plans and elevations submitted in support of the application.

All bat species 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 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.

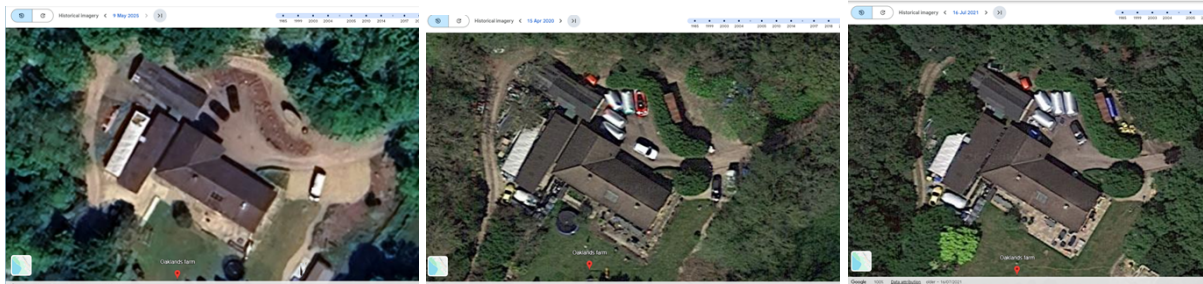
Bat droppings were found in the roof space of the dwelling, at the base of both gable end walls, during the PRA internal inspection. Approximately 250 individual droppings were at the base of the southeast gable end wall. Approximately 150 droppings were to the left, and approximately 100 were to the right of the centre of the wall. Approximately 30 individual droppings were on the insulation, between 1m and 2m out from the northeast gable end wall, and approximately 100 were near the

base of the wall, to the right. A few individual droppings were also on both walls. DNA analysis of the droppings confirmed they are from the Soprano pipistrelle. According to the findings of PRA bungalow contains two *Soprano pipistrelle* bat roosts. According to the PRA there potential roosting features on the garage/timber store.

Emergence surveys were carried out on 28 July, 19 August and 21 September 2025. On July, six Soprano pipistrelle bats emerged from the southeast gable end.



I am satisfied that the survey effort and methodology are adequate for the Ecologist to conclude that a Bat Mitigation Licence must be obtained from Natural England to legally implement the development proposed which would result in the destruction of two Soprano pipistrelle bat roosts. If the application is approved in accordance with BS42020:2013 9.3.3 and D.6.2 a planning condition should be imposed requiring a copy of the European Protected Species Licence or a Bat Mitigation Class Licence and the mitigation strategy approved by Natural England.



While the Ecologist concludes that the garage has negligible bat roost potential, it unclear if the impact on wildlife of demolition of the outbuilding in the southeast and works to the access road have been assessed. I request confirmation whether the Ecologist's internal and external inspections included outbuilding D. I note night vision aids and bat detectors were only sited on the north and east of the main dwelling in the emergence surveys. There is no information or photos of Outbuilding D. The survey report failed to assess the impact of the proposed works to "reshape and resurface" the access track to the west and south of the bungalow and carport.

BS42020 Code of practice for planning and development paragraph 6.4.8 states:

"Where relevant, any report on survey activities should also 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;

b) alteration or loss of other biodiversity features, such as hedgerows, ponds, ditches or buildings and features of value to protected species;...

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".

I am concerned that the Ecologist has failed to take account of the impact to wildlife including foraging and commuting bats of the tree felling and hedge and shrub clearance were undertaken prior to submission to facilitate the demolition and construction proposed. Comparing aerial photos from 2021 and 2015 shows that large tree west of the garage and thick hedge southeast of the eastern access have been removed to facilitate the proposed development.

The PRA, Planning Statement do not include photos, a habitat plan or details of existing and proposed boundary treatments and features which should have been included in the Site Plan according to local and national validation guidance. I disagree with the application form that there are no trees or hedges impacted by the proposals because of the proposed development of the access road and query whether development has commenced I also note the development proposals described in the Bat Survey Report only include the extending the dwelling only at the rear and replacing the roof.

I support the mitigation given Section 5 of the Bat Survey Report. However, I disagree that according to the current best practice guidance UK Bat Mitigation Guidelines V1.2 (CIEEM, August 2025) and the NPPF 2024 paragraph 187, that one cavity box fixed to a tree is adequate to permanently compensate the losses, and maintain the favourable conservation status of bats on the site. The Bat Survey Report includes no proposals for compensation for the loss of roost proposed to be

integrated in either outbuildings or the house.

According to Local Plan 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. Development proposals will be required to demonstrate how they have responded through the submission of Design and Access Statements, clear and informative plans, and elevations.

North and South Elevation Proposed cross section drawings (Tony Holt, Dwg 010, 19 December 2025) show proposals for an “*integrated bat box*” in both gable ends of the new gym/garage outbuilding. However, the Bat Survey Report fails to include details of this necessary compensation for loss of potential roosting features and the roost which will be permanently lost. In the absence of a bat loft and/or integral bat tubes the mitigation proposed in the Bat Survey Report does not ensure the favourable conservation status of bats will be maintained or compliance with the WBC local plan. The extent of the proposed glazing and impact of western terrace fail to demonstrate that the impact of light pollution on bats has been adequately considered and the no details of hard landscaping, tree works or access construction have been provided. No drainage plans have been submitted.

The development shown in Outline of Permitted Development Rights (Tony Holt, Dwg, 013 , 16 January 2026) may not be implemented without a European Protected Species Licence from Natural England. I request Dwg 013 is not approved.

Summary

I have considered the three Habitat Regulations tests, and I am also satisfied it is not unlikely Natural England would grant a EPSL if the application is approved. While the mitigation the Ecologist recommends is secured is inadequate, provided wildlife including hedgehogs, breeding birds, and amphibians are protected during construction and a tree survey and compensation for habitat degradation are addressed in line with Local Plan policy, if a light and EPS condition are imposed 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 Natural England and a copy of the licence and approved mitigation strategy, (or an email from Natural England that the site has been registered under a Bat Mitigation Class Licence or Bat Earned Recognition Class Licence) have been submitted to the council. Thereafter the approved mitigations measures shall be maintained in accordance with the approved details.

Reason: To ensure that 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: Prior to commencement of development detailed wildlife-sensitive lighting proposals designed in accordance with best practice including [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 proposals shall:

a) identify those areas/features on site that are particularly sensitive for bats, birds and invertebrates 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: 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.

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) or The Conservation of Habitats and Species Regulations 2017 (as amended). The applicant is advised to contact an ecological consultant contacted for further before works can proceed.

Date:	14/05/26	Signed:	T Cuss
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