
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251072
Address:	8 Grove Close, Wokingham, RG40 3NA.		
Proposal:	Householder application for the proposed erection of a part single part two storey rear/side extension following demolition of existing single storey rear and side extensions, plus installation of a new canopy roof over existing porch.		
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 emergence surveys Ecological Survey Report (NWP/ERS-22.9.25-v1, 22 September 2025) and reviewed Preliminary Bat Roost Assessment (John Wenman Ecological Consultancy, Ref S2986_PRA_a, June 2026) the plans and elevations submitted in support of the application.

Legal Protection

All British bats 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 a criminal 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.

Potential roosting features suitable for bats were recorded including gaps between the roof tiles along the verges, gaps beneath tiles close to the base of both side of the chimney. On the front elevation there were gaps between the soffits boards and the wall that would be suitable access opportunities. No bats were seen emerging from or returning to the property during emergence surveys on 28 August and 20 September. While completed at the very end of the optimal period May to August and no surveyor is positioned on the west side of the property, the survey has

otherwise been undertaken to an adequate standard. I can agree with the Ecologist's conclusion that bats are not currently roosting in the property. I support JWEC's assessment that adjacent private gardens and extensive Forestry Commission broadleaved woodland provides continuous habitat of high suitability for use as bat flight paths and feeding habitat. I must disagree with the Ecological Survey Report that the property has negligible potential. JWEC stated that the PRA report contains information regarding a mobile species so it will likely be valid for less than 12 months. BatCraft's Ecologist fails to advise how long the survey results are valid, or proposed resurvey if the development is not implemented within 18 months.

I commented that the PRA report should have address the detrimental impacts of light pollution of the floodlights and uplighters obstructing and deterring foraging and commuting bats and guidance should be given to the owner including ILP/BCT GN/23 Bats and Artificial Lighting at Night. The photos of the emergence survey show the light pollution caused by the unnecessary uplighters and floodlights on the first floor. However, BatCraft have failed to take account of my comments on the PRA report. Contrary to the Good Practice Guidelines they provide no assessment of the constraints and detrimental impacts from lighting on bats and fauna commuting the woodland to the north nor propose any mitigation to address the light pollution to safeguard and conserve bats and wildlife in line with planning policy.



According to Local Plan policy CP3 planning permission will be granted for proposals that d) 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 clear and informative plans. CP7 states that development which may harm species of principle should put in place mitigation measures to prevent damaging impacts. According to MDD TB23 Planning permission will only be granted where they also demonstrate buffer species of principle importance and ensure that all developments are ecologically permeable.

The precautionary measures outlined by JWEC's ecologist are not included in the Ecological Survey Report and no enhancement features or replacement planting have been proposed to compensate for the loss of potential roosting features and the site clearance previously undertaken to facilitate the development. Provided that a toolbox talk is provided to contractors, the works affecting the potential roosting areas adopts a soft roof strip approach (i.e. careful removal of roof coverings by

gloved hands and hand-held tools), if bats or evidence is found a licensed ecologist is called in, a bat-friendly external lighting scheme is approved, and installation of new bat roosting features are secured in line with the NPPF paragraph 187 and Local Plan policies and best practice, there are no ecological objections. If the development does not commence within 18 months from the date of the planning consent further bat surveys should be commissioned to establish if there have been any changes in the presence and/or abundance of bats and identify any likely new ecological impacts that might arise from any changes.

Conditions & Reasons (if required)

Condition: Unless otherwise previously agreed in writing by the council works are to be carried out in full accordance with the proposals, recommendations given in Section 8.2.3 - 8.2.6 of the submitted Preliminary Bat Roost Assessment (John Wenman Ecological Consultancy, Ref S2986_PRA_a, June 2026).

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.

Condition: Prior to the commencement/re-commencement of development, details of biodiversity enhancements, to include integral bat boxes, bricks or access tiles or in the buildings and native and wildlife friendly landscaping, shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved.

Reason: To ensure that wildlife and priority species are not adversely affected by the proposals and incorporate biodiversity in and around developments. Relevant policy: Paragraph 187 of the NPPF, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Prior to the commencement of the development a lighting design strategy for light-sensitive biodiversity, designed in accordance with Institution of Lighting Professionals 'Guidance Note 08/23 Bats and Artificial Lighting at Night' shall be submitted to and approved in writing by the local planning authority. The scheme shall with details of location, height, type and direction of light sources and intensity of illumination and through the provision of appropriate colour contour plans and technical specifications clearly demonstrate that any areas to be lit will not disturb or negatively impact biodiversity. All external lighting shall be installed and maintained in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

Reason: To protect biodiversity. Relevant policy: NPPF Section 15 and paragraph 198 and Local Plan policies CP1, CP3 CP7 and MDD TB23.

Despite ecological surveys being undertaken which suggest that protected species are not using the application site, bats are mobile creatures, and 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.

Date:	25/9/2025	Signed:	T Cuss
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