

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251450
Address:	353 Nine Mile Ride, Finchampstead, Wokingham, RG40 3NH.		
Proposal:	Full application for the proposed erection of 1 no. detached dwelling following demolition of the existing dwelling, with associated landscaping and swimming pool.		
Type of Development:	Minor Dwellings (1-9)		
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 Bat Roost Assessment & Great Crested Newt Habitat Assessment (Chase Ecological Consultancy, Ref CE4760, 14 February 2025) Arboricultural Impact Assessment Method Statement and TPP (ATS, March 2025) and reviewed the plans and elevations submitted in support of the application.

Legal Protection

All wild birds, their nests and eggs are protected it an offence under Wildlife and Countryside Act 1981 (as amended) to kill, injure, or take any wild bird; take, damage or destroy bird nests whilst it is in use or being built; or take or destroy an egg of any wild bird.

All species of bats receive special protection under UK law, and it is a criminal offence 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.

Under The Conservation of Habitats and Species Regulations 2017 (as amended) A person is guilty of an offence if they:

- a) Deliberately captures, injures or kills any wild animal of a European protected species,
- b) Deliberately disturbs wild animals of any such species,
- c) Deliberately takes or destroys the eggs of such an animal, or
- d) Damages or destroys a breeding site or resting place of such an animal,

Disturbance of animals includes in particular any disturbance which is likely—

a) To impair their ability:

- i. To survive, to breed or reproduce, or to rear or nurture their young; or
- ii. In the case of animals of a hibernating or migratory species, to hibernate or migrate; or

b) To affect significantly the local distribution or abundance of the species to which they belong.

Bats are also protected under the Wildlife and Countryside Act 1981 (as amended) Under this Act, they are additionally protected from:

- Intentional or reckless disturbance (at any level)
- Intentional or reckless obstruction of access to any place of shelter or protection.

A bat roost is interpreted as “any structure or place used for shelter or protection” whether or not bats are present at the time.

A small number of bat droppings were observed within the upper main roof void spaces on the chimney and floor areas below. The felt roof membrane coverings may offer additional roosting habitats for bats between the membrane and tiles with potential gaps providing external access. Evidence such as droppings would not always be visible from within these enclosed habitats. There are habitats of value to bats including woodland, parkland, open fields, hedgerows and waterbodies of which support feeding and commuting.

The Preliminary Bat Roost Assessment has been undertaken to the appropriate standard and concludes that the house has a confirmed roost and potential roosting features would be lost as a result of the proposals. To characterize the bat roost Ecologist advises that three bat emergence surveys are required during the active bat season (optimal May to August, suboptimal September).

Protected species are a material consideration and the presence/absence of a species and the implications of the proposal on protected species must be considered at the point of determination. It is not possible to condition these surveys as part of granting permission. In line with the requirements of policies CP3, CP7 and MDD TB23 I request a report of the follow up surveys that have been recommended along with any mitigation proposal so impacts on protected species are considered and all necessary avoidance, mitigation and enhancement measures can be secured.

Summary

The house hosts roosting bats and has potential roost features which would be lost as a result of the proposal to demolish the house. Further survey must be undertaken to characterize the bat roost, and propose a detailed mitigation and enhancement strategy to maintain the favourable conservation status of bats in the locality and avoid impact on breeding birds. The application should not be determined until the survey has been carried out, or lack of ecological information can be included in reasons for refusal.

Conditions & Reasons (if required)

Awaiting bat emergence survey report and mitigation and enhancement strategy.

Date:	31/07/25	Signed:	T Cuss
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