

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	242961
Address:	Heriots, Wokingham Road, Hurst, Wokingham, RG10 0RX.		
Proposal:	Proposed erection of a single storey extension; link extension to curtilage listed outbuilding and enlargement of first floor element over kitchen (part-retrospective). Removal of flue on east elevation; removal of black timber cladding from west gable end and two storey element of east elevation; replacement of ground floor French doors on east elevation with triple windows; alteration and extension of first floor rear extension. Reinstatement of partition wall in ground floor front bay; remodelling of main staircase and removal of first floor staircase and installation of faux fireplace & removal of walls and fittings forming ground floor WC		
Type of Development:	Other Listed Building alteration or extension		
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 Phase 2 Bat Survey (Dr Jonty Denton, September 2025), Phase 1 Daytime Bat Assessment (Dr Jonty Denton, 10 September 2024), and Heritage review of proposals (Ridgeway 5 September 2025), I have also reviewed the Heritage Assessment Report (Ridgeway, Ref RHC 2024-36, September 2024), Heritage Note – Assessment of unauthorised works (JP Heritage, 24 February 2025), Planning Statement (Mark Leedale Planning, Ref WR/16/188, November 2024) and plans and elevations submitted in support of the application.

All wild birds are granted legal protection under the Wildlife and Countryside Act 1981 (as amended). This legislation protects the birds, their eggs and nests whilst being built or in use. Bats are fully protected under the WCA 1981, as amended, and The Conservation and Species Regulations 2017 (as amended) from intentional killing and injury and from intentional damage, destruction or obstruction of access to a place of shelter. It is an offence to kill or injure a bat or interfere with any roosting or resting

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

The Phase 1 Daytime Survey external inspections recorded numerous potential roosting features and openings into the under-tile spaces on the roof and into the under eaves. The roof space above the northern extension roof void was not accessible to the Ecologist, and had a potential access for bats at the apex of the northern gable. A few old bat droppings were recorded in the main loft of the 17th Century part of the house. (Photos in figures 1 to 7 show the potential roosting features for bats).

There is historic evidence of bat activity in the main roof void and dozens of potential roosting features for crevice-dwelling bats. I agree with the Ecologist's conclusion that the property has high bat roosting potential.

Dusk emergence surveys were carried out on 7 May, 18 July and 21 September 2025. Fourteen Soprano pipistrelle bats were recorded emerging from the roof of the oldest part of the house on 18 July 2025. Six from the west and eight from the eastern end. I agree with the Dr Denton's assumption that the property is likely to support a small Soprano pipistrelle maternity roost. One Common pipistrelle bat emerged from the ground floor extension (point A on Fig 2) on 7 May 2025. Common and Soprano pipistrelle were recorded foraging and commuting around and over the site.

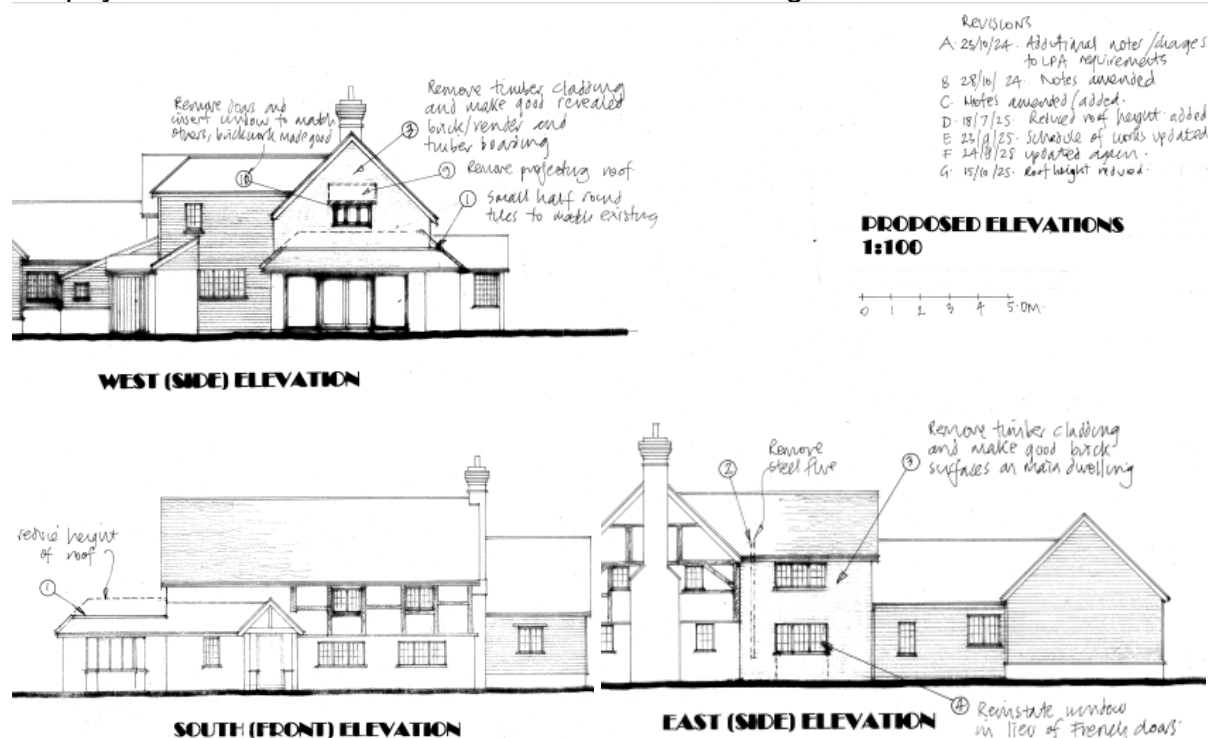


Figure 2. Emergence points 2025

According to the Phase 1 survey, the loft has large amounts of nest material from generations of house sparrows. House Sparrows are a Red List species of Conservation Concern. In accordance with policy must be protected and adequate mitigation secured to maintain the population and provide enhancement.

Protected Species Mitigation

The Phase 2 Survey report does not provide any assessment of the development proposals and works proposed. Dr Denton has not advised and reminded the Owner that, in the absence of a European Protected Species Licence, the alteration and extension of first floor rear extension and removal of timber cladding from west gable end, northern and east elevations is likely to cause illegal disturbance of bats and the loss of bat roosts. The results of three emergence surveys undertaken do not include roost characterization in accordance with Bat Surveys for Professional Ecologists: Good Practice Guidelines 4th Ed. To be granted a EPSL and comply with planning policy, sufficient information must be collected to inform the impact assessment and design of mitigation measures and should also include collection of information about the physical characteristics of the roost and surrounding area.



I am concerned that no information on temperature, humidity and the site lighting has been presented in the Phase 2 Bat Survey. The report does not provide any information on the constraints to timing of the works, to the single storey extension and the removal of cladding; and no consideration is given to the impacts of scaffolding. The three emergence surveys do not rule out the presence of hibernation roosts, and it is unclear if further winter surveys are planned or recommended by the Ecologist.

If adequate roost characterization surveys and assessment are completed, and a detailed mitigation strategy including timing and provision of replacement roosting features are proposed, I consider that it is not unlikely that Natural England would grant derogation licence to allow works to proceed legally. However, the SNCO will not issue a EPSL until planning permission including approval of a bat avoidance and mitigation strategy have been issued by the LPA. A bat (and where necessary breeding bird) mitigation strategy that considers the detail of the development proposals and the potential for hibernating bats must therefore be provided to the LPA prior to determination. As previously advised, the report propose compensation proposals which can be secured by condition and be prepared in line with current UK Bat Mitigation Guidelines V1.2 best practice. The three derogation tests must also be considered.

I support the advice in the Phase 1 survey that new exterior lighting should be avoided. If the applicant demonstrated that minimal lighting was necessary for health and safety, a bat-sensitive lighting scheme would need to be designed to comply with ILP/BCT Bats and Artificial Lighting at Night GN08/23. In line with planning policy and guidance and BS42020, I request an external lighting condition is included in the decision notice or an external lighting plan is included in condition 2.

Conditions & Reasons (if required)

Awaiting Phase 2 Bat Survey conclusions, Ecologist assessment of development works proposed and detailed protected species mitigation and enhancement strategy.

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 Earned Recognition Licence have been submitted to the council. Thereafter mitigations measures detailed in the licence shall be maintained in accordance with the approved details.

Reason: To ensure that protected species are not adversely affected by the proposals. Relevant policy: NPPF Section 15 Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: At no time shall external lighting be installed on the site or affixed to any buildings on the site without the prior written approval of the local planning. All external lighting must be designed in full accordance with the recommendation Guidance Note 02/23 Bats and Artificial Lighting at Night (ILP/BCT 2023)

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF paragraph 198 Section 15 (Conserving and Enhancing the Natural Environment), Core Strategy policies CP1, CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition:

Date:	18/11/25	Signed:	T Cuss
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