

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	261636
Address:	24 Falstaff Avenue, Earley, Wokingham, RG6 5TQ.		
Proposal:	Householder application for the proposed erection of two-storey side extension, raising of roof, 1no. rear roof dormer with 3no. Juliet balconies, loft conversion, 4no. rooflights and changes to fenestration.		
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 Bat Roost Assessment (GS Ecology, Ref ECO3911, 22 October 2025) and the Phase 2 Bat Emergence Survey (Dr Jonty Denton, July 2026). I have also reviewed the submitted plans and elevations.

The Preliminary Bat Roost Assessment internal inspection recorded approximately 15 small bat droppings – akin to those of pipistrelle bats – found stuck to the southern end wall of the main loft. The Ecologist notes it was not possible to fully access the northwestern loft space due to its small size. In accordance with the Bat Survey Good Practice Guidelines the Ecologist assessed that 24 Falstaff Avenue as having “High” bat roost potential.

Emergence surveys were completed on 25 May and 15 June 2026. Bat activity was very low. Bats are opportunistic and switch roosts frequently. I am satisfied that the survey effort and methodology are adequate for the ecologist to conclude that bats are not currently roosting in the property. To minimize the risk of illegal disturbance and comply with planning policy mitigation and enhancement measures recommended by the Ecologist including implementation in line with an approved method statement of works, removal of the flood light near the upstairs windowsills, and integration of two bat bricks into the north and south gable ends must be secured by condition.

Bird and bat and other species active at night are sensitive to light pollution. Artificial light may cause disturbance and/or discourage these species from using their breeding and resting places, established flyways or foraging areas. Such disturbance can constitute an offence under relevant wildlife legislation.

According to NPPF 2024 planning decisions should limit the impact of light artificial light pollution from on local nature conservation as well as providing net gains for biodiversity, and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

NPPF Section 14 P4 states development proposals should take into account the likely effects (including cumulative effects) of pollution on health the natural environment, whether this is as a result of the development itself or the product of preexisting conditions in its vicinity. In assessing the potential effects of pollution, consideration should be given to the potential sensitivity of the site, as well as that of the environment. Development should not contribute to unacceptable levels of artificial light pollution. Adverse impacts of this nature should be avoided where possible, or else mitigated to an acceptable degree. Where possible, opportunities should be taken to reduce pollution such as improved external lighting affecting the wider area.

I object to the Ecologist's recommendation of reuse of the existing floodlights. Moving floodlights to below the first floor on the corner of the building would not ensure the light pollution is minimized and dark corridors for birds and commuting and foraging bats will mitigate the impact of the existing and proposed development in accordance with policy and best practice. The existing floodlights and the resulting light pollution has not been demonstrated to be necessary and justified, and may have deterred or obstructed bats from using the roost.

For the above reasons, in line with BS42020 and NPPF 2026 Section 14 P3, I request a planning condition requiring removal of the floodlighting on the first floor and approval, implementation and maintenance of a scheme of wildlife-sensitive lighting scheme designed in accordance with [Bats and Artificial Lighting at Night' Guidance Note GN 08 / 23](#).

Conditions & Reasons (if required)

Condition: Within 2 months of the date of this decision a detailed bat mitigation and enhancement strategy which includes details of timing, ecological supervision careful removal of roof tiles by hand, and details of two integral bat bricks (such as Habibat 001 or functional equivalent) shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved and permanently retained in accordance with the timetable and approved scheme of enhancements.

Within one month of substantial completion a short closing-out report demonstrating that the ecological mitigation and enhancement measures have been implemented to the satisfaction of the Owner's Ecologist is to be issued to the council

Reason: To ensure that biodiversity, protected and priority species are not adversely affected and incorporate biodiversity in and around developments. Relevant policy: NPPF 2026 Section 19 N2 (Conserving and Enhancing the Natural Environment), Local Plan Core Strategy policies CP3 and CP7 Managing Development Delivery policies CC03 and TB23.

Condition: Prior to commencement of development an external lighting scheme for biodiversity designed in accordance with best practice including in accordance with 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 strategy shall:

a) identify those areas/features on site that are particularly sensitive for bats and birds 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 bats, a protected and priority species (as per the NPPF), are not adversely affected by the proposals. Relevant policy: NPPF 2026 Section 14 P3, Core Strategy policies CP1, CP3 and Managing Development Delivery Local Plan policy TB23.

Date:	17/09/26	Signed:	T Cuss
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