
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260696
Address:	Santolina, Nine Mile Ride, Finchampstead, Wokingham, RG40 4QB.		
Proposal:	Householder application for raising and forming new pitched roof, loft conversion, single storey rear extension and installation of 7 no. pitched roof dormers and 6 no. skylights, including a front porch 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 Technical Note Preliminary Roost Assessment (AA Environmental, June 2026) and reviewed the submitted application form, visuals, elevations and plans.

Internal and external inspections of the bungalow were carried out on 21 May 2026 in line with Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th ed). A few individual bat droppings were recorded on the north-western gable wall of the property. DNA analysis confirmed that the property supports a Common pipistrelle roost. The Ecologist does not provide details of the confirm whether they consider there could be a maternity roost in the cavity

All species and their roosts are protected under Regulation 41 of The Conservation of Habitats and Species Regulations 2010 (as amended). As a signatory to the Bonn Convention (Agreement on the Conservation of Bats in Europe) the UK is also required to protect their habitats. This legislation makes it illegal to kill, injure, capture or disturb bats or to obstruct access to, damage or destroy bat roosts and protection from damage or disturbance of important feeding areas. Under the law, a roost is any structure or place used for shelter or protection.

The Ecologist recommended that further bat activity surveys are required to confirm

the status of the bat roost and provide the further details required to support a bat licence application to Natural England. Paragraph 99 of Government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System states that: *"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted."* In this case the extent to which may be affected by the proposals has not been established, and there are no "exceptional circumstances". Approval of the application in the absence of the further surveys and mitigation proposals would not be contrary to the above and to planning policy including the CP3, CP7 and MDD TB23.

I do not agree with the Ecologist that the site has remained largely unchanged since 1999. Streetview and Google Earth show the trees felled and biodiversity habitat which have been removed, including since January 2020. The bat emergence survey report should include details, assessment of impact and propose compensation for the loss of biodiversity habitat and detrimental impact on bat foraging, commuting and swarming in line with best practice including BS42020, the bat survey Good Practice Guidelines and the local plan.

I am concerned that the Visuals drawing (Design Works Studios Dwg 710, 4 April 2025) is not consistent with the Proposed Roof Plan and Proposed Elevations. They show that the gable end walls, including where the bat roost was confirmed are not proposed to be retained. The visuals must be amended to be consistent with the planning proposals and the Preliminary Roost Assessment. If the application was subsequently approved the DWG 710 dated April 2025 must not be approved. The bat emergence survey and revised PRA should include details of existing external lighting and constraints and impacts on bat activity surveys. I recommend that detailed lighting proposals are included with the revised plans in order to mitigate for impacts to birds, bats and nocturnal species and provide enhancement for wildlife.

In order to assess the impact of the proposals, I request submission of a Proposed First Floor Plan, as well as a Site Plan and a Proposed Site Plan showing boundary features, hedgerow, orchard habitat and all trees that are existing and those proposed to be retained. No Tree Survey or Arboricultural Impact Assessment has been submitted although trees on the west of the Site Area are tree T8 from the order TPO 1678 :2019. While the PRA states that no established trees will be affected by the works the orchard loss, and tree works which have been carried out recently, including to facilitate construction of an additional outbuilding have been omitted from the survey. No assessment of the roosting potential of remaining trees and the outbuildings on the site is provided in the current PRA report. BS42020 Code of practice for planning and development paragraph 6.4.8 states that 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;
 c) control of weeds or other species; and
 d) cessation or reintroduction of grazing or mowing.
 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”.



Summary

I will be happy to provide comments when an Arboricultural Impact Assessment and Bat Emergence Survey, as well as revised and omitted plans requested above and proposals to enhance the site and maintain bat populations and other wildlife have been submitted.

I request Trees & Landscape are consulted when the AIA has been received or if any TPO's trees have been affected by the works in the Site Area carried out to date.

Conditions & Reasons (if required)

Awaiting bat emergence surveys and mitigation strategy, AIA, First Floor Plan and amended Site Plan showing trees, hedges and boundary features.

Date:	20/07/26	Signed:	T Cuss
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