

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	250597
Address:	18-32 London Road, Twyford, RG10 9ER.		
Proposal:	Full application for proposed raising of the existing roof to form 2No. 2-bedroom apartments, with sub-division of two existing two-bedroom first floor apartments to form 4No. 1-bedroom apartments together with associated works including parking and cycle storage provision following demolition of existing outbuildings.		
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 reviewed the plans and elevations and Planning, Heritage and Design and Access Statement submitted in support of the application. I have also reviewed the Draft Preliminary Bat Roost Assessment (John Wenman Ecological Consultancy, Ref R3293/b, November 2022) and Bat Emergence Survey (John Wenman Ecological Consultancy, Reg R3453/a June 2023) submitted in support of application 223577.

All British species of bats and their roosts are fully protected by The Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). This legislation makes it a criminal offence to deliberately or recklessly to destroy, damage or to obstruct access to their roosts, or to disturb, kill or injure, capture or disturb bats, without first having obtained the relevant licence 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.

WBC Local Plan policy CP3 states 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. According to the NPPF paragraph 187 planning decisions should contribute to and enhance the natural and local environment by minimising impacts

on and providing net gains for biodiversity, and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

Provided that works affecting the roof are undertaken in accordance with the 'soft strip approach set out in paragraph 6.1.3 of the Draft Preliminary Bat Roost Assessment and a scheme of ecological compensation and enhancements is secured by planning permission, there are no ecological objections to the development as proposed. I also request that informative I19 is included in the decision notice.

Conditions & Reasons (if required)

Condition Prior to the commencement of the development, details of biodiversity enhancements, to include bird boxes, tiles or bricks on and around the buildings and native shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved.

Reason: To incorporate biodiversity in and around developments in accordance with

paragraph 187 of the NPPF. Relevant policy: Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Despite 2023 ecological surveys being undertaken which suggest that protected species were 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:	27/05/25	Signed:	T Cuss
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