
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	261545
Address:	The Spindles, School Hill, Wargrave, Wokingham, RG10 8DY.		
Proposal:	Householder application for the proposed erection of single storey side and rear extension with rooflights and adaptation for wheelchair accessibility. Plus changes to fenestration and addition of air source heat pump.		
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 Ecological Appraisal & Preliminary Roost Assessment Report V1 (Cloverwood Ecology, 25 June 2026) and reviewed the plans and elevations.

All species of bats and their roosts are protected species. In summary the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended) make it illegal to:

- intentionally or deliberately kill, injure or capture (or take) an EPS,
- deliberately disturb an EPS,
- recklessly disturb an EPS or obstruct access to breeding site or place of shelter and
- damage or destroy 'any structure or place which any EPS uses for 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 daytime walkover survey was carried out by the Ecologist on 27 May 2026. Two bat droppings were recorded in roof Void 2, and 100-150 bat droppings were recorded in Void 1 concentrated towards the eastern aspect under the apex of the roof. The house, Building B1, will be impacted by the proposed development and was assessed as a confirmed roost for a currently unknown bat species. Therefore,

in line with the best practice guidelines, further survey for roosting bats is required before determination to confirm the species present and assess the roost type and secure mitigation. I agree that further surveys are necessary to inform a European Protected Species Licence application to Natural England, required for the works to proceed lawfully. The roost characterization survey must include three dusk emergence surveys during May to August, inclusive, at least three weeks apart.

Government Circular 06/05 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 bats will be affected by the proposals has not been established, and there are no "exceptional circumstances". Approval of the application would not be contrary to the Circular, the NPPF and Local Plan policies.

The Ecologist should be aware bat roosts were very recently recorded at Montana Cottage less approx. 40 meters to the north (WBC ref 260526). To help the design of the bat activity survey I recommend a comprehensive desk study includes a local bat group or TVERC data and local planning history search.

Conditions & Reasons (if required)			
Awaiting bat emergence survey and mitigation strategy and Tree Survey/Tree Protection Plan.			
Date:	17/07/26	Signed:	T Cuss