

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251994
Address:	24 Falstaff Avenue, Earley, Wokingham, RG6 5TQ.		
Proposal:	Householder application for the proposed erection of a rear orangery with glazed roof lantern, alongside the raising of the main roof ridge with front roof lights and a rear-facing box dormer to facilitate a loft conversion.		
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 reviewed the plans and elevations submitted in support of the application.

All species of British bat are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as amended. Under this legislation it is an offence to deliberately or recklessly to destroy or damage their roosts, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations 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.

The house is detached with cavity brick walls, and has a number of features which are suitable for use by roosting bats including:

- Gaps in mortar at the gable verge
- Gaps where the bargeboard of the main roof meets the soffit of the northwestern roof
- Gaps between the felt and wall where the porch joins the house.

The habitats surrounding the site are of 'moderate' to 'high' suitability for commuting and foraging bats.

The internal inspection recorded 15 bat droppings of a size and shape similar to those of Pipistrelle bats, stuck to the southern end wall. I agree with the Ecologist's conclusion that the house has High bat roosting potential because there is a confirmed bat roost. A roost/s would be destroyed as a result of the proposed development and bats may be disturbed, a European Protected species licence will need to be obtained to allow the development to be undertaken legally. To characterize the roost and mitigation needed to maintain the favourable conservation status of bats, three dusk emergence surveys must be carried out between 1 May and 30 September with at least two surveys completed between May and the end of August in line with the methodology proposed in sections 4.8 and 4.10 of the PRA report and 2024 UK Bat Mitigation Guidelines V1.2.

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"*. There are no exceptional circumstances in this case and the extent to which bats will be affected by the proposals has not been established. Therefore determination of application would not be in accordance with the above planning policy.

Summary

The application should not be approved until the three further emergence surveys proposed in sections 4 and summary section 5 and a detailed protected species mitigation and enhancement strategy are submitted. If emergence surveys are not provided, the application may be refused on grounds of lack of ecological information and impact to protected species contrary to the NPPF and Local Plan policies CP3 and CP7.

Conditions & Reasons (if required)

N/A.

Awaiting Bat emergence survey and mitigation strategy.

Date:	26/11/25	Signed:	T Cuss
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