

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252292
Address:	1 Lancaster Gardens, Earley, Wokingham, RG6 7PA.		
Proposal:	Householder application for the proposed erection of a first floor side rear extension plus conversion of loft to create habitable accommodation to include hip to gable plus dormers to the front and rear elevation.		
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 (Chase Ecological Consultancy, Ref CE5074, 17 December 2025) and reviewed the plans and elevations submitted in support of the application.

All bat species 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 in 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 PBRA internal and external inspection adequate. However, the desk study fails to include local planning history or a local records search. The Ecologist has made no reference to the records of roosting bats in Lancaster Gardens in similar properties to No1 and that rain will wash away evidence of bats on external surfaces like hanging tiles. Local Plan policy CP3 states planning permission will be granted for proposals that maintain or enhance the ability of the site to support fauna and flora including protected species. Development proposals will be required to demonstrate how they have responded through the submission clear and informative plans, elevations and streetscenes. According to NPPF 2024 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”*. Contrary to the 2024 NPPF and local plan policies, the PBRA includes no mitigation measures or enhancements for bats to compensate the development.

Birds, bats and species active at night are sensitive to light pollution. Artificial light may disturb and/or discouraged from using their breeding and resting places, established flyways or foraging areas. Such disturbance can constitute an offence under relevant wildlife legislation. The Ecologists fails to record and assess the negative impacts of uplighters on birds, bats and other wildlife.

Provided that a condition securing the use of bitumen type 1F, or a non-snagging roofing membrane (NBCRM) with a test certificate approved by Natural England, an integral Habibat bat or equivalent bat tube will be provided, the hanging tiles will be retained and the development will be implemented in strict accordance proposals and no hanging tiles will be disturbed or removed there are no ecological objections to the development proposed. Wood timber treatments must only use treatments included on the approved list of ‘Bat roost and Timber products (TIN 092)13.

Conditions & Reasons (if required)

Condition: All works are to be carried out in full accordance All ecological measures and/or works shall be carried out in full accordance with the mitigation advice details contained in the submitted Preliminary Bat Roost Assessment (Ref CE5074,17 December 2025) and Appendix 4 as agreed with owner prior to determination.

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: Prior to commencement of development, details of biodiversity enhancements, to include Habibat bat box (or equivalent integral bat tube, bat tiles or bricks) and bird on the buildings and details of the bitumen type 1F felt with a hessian matrix, or a non-bitumen coated roofing membrane (NBCRM) with a test certificate approved by Natural England that will be used. Wood timber treatments must only use treatments included on the approved list of ‘Bat roost and Timber products (TIN 092)13. 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 2024. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Despite ecological surveys being undertaken which suggest that protected species are not using the application site, bats are mobile creatures, and it is possible that protected species may be encountered once works commence. I advise 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:	02/03/26	Signed:	T Cuss
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