M E M O R A N D U M

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	**App No:**	260731
Address:	Oaklands Farm, Forges Lane, Finchampstead, Wokingham, RG27 0RB.		
Proposal:	Prior approval submission for the proposed enlargement of the existing bungalow through the erection of 1 no. additional storey to a maximum height of 7.3 metres.		
Type of Development:			
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 Roost Assessment (KJF Consultancy, Ref PRA.V1.D.G.OF.NMR.E.H, 3 August 2025) and Bat Survey Report (SR.V1.D.OF.NMR.E.H, 23 September 2025). I have also reviewed the plans and elevations submitted in support of the application.

All UK species of bats and their roosts (even if bats are not present) are protected by UK and international law. Bats and their roosts are afforded protection under The Habitats and Species Regulations 2017 (as amended) and the Wildlife and Countryside Act 1981 (as amended). In the absence of the relevant licence for derogation from the regulations from Natural England it is offence to:

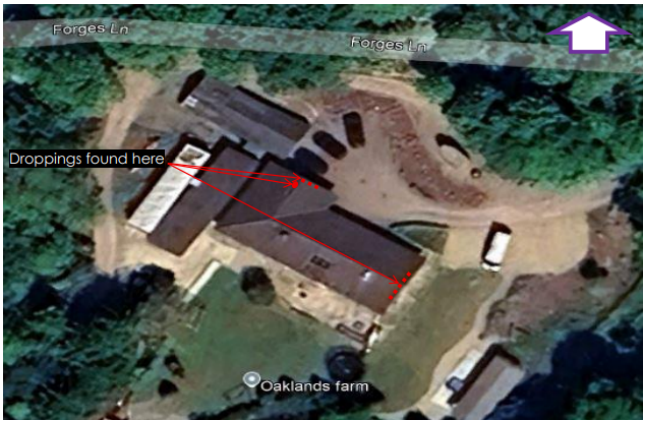
- Deliberately take, injure or kill a wild bat.
- Intentionally or recklessly disturb a bat in its roost or deliberately disturb a group of bats.
- Damage or destroy a place used by bats for breeding or resting (roosts), even if bats are not occupying the roost at the time.
- Intentionally or recklessly obstruct access to a bat roost.

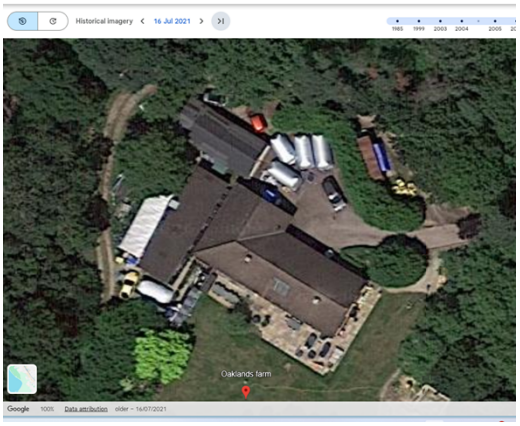
Bat droppings were found in the roof space of the dwelling, at the base of both gable end walls, during the PRA internal inspection. DNA analysis of the droppings confirmed they are from the *Soprano pipistrelle*. According to the PRA there are no potential roosting features on the garage/timber store. Emergence surveys were

carried out on 28 July, 19 August and 21 September 2025. On 28 July, six *Soprano pipistrelle* bats emerged from the southeast gable end.

The development proposals require removal the bungalow roof which would result in the loss of two bat roosts as well as soffits and wooden cladding potential roosting features for crevice-dwelling bats. I am satisfied that the survey effort and methodology are adequate for the Ecologist to conclude that a Bat Mitigation Licence must be obtained from Natural England to legally implement the development proposed which would result in the destruction of two Soprano pipistrelle bat roosts. In line with BS42020:2013 9.3.3 and D.6.2, if the application is approved a planning condition should be imposed requiring a copy of the European Protected Species Licence or a Bat Mitigation Class Licence and the mitigation strategy approved by Natural England.

All development must be implemented in accordance with the mitigation, compensation and enhancement recommended in detail in Section 5 of the Bat Survey Report. I do not recommend approving Proposed Elevations Dwg 008 Rev B 14/05/2026 in condition 2. The proposals do not show two Ridge Roost Boxes as recommended by KJF Consultancy or suitable alternative approved by Natural England are proposed by the Designer and therefore that there would be a ˈlike-for-likeˈ permanent replacement of bat roosts.





BS42020 Code of practice for planning and development paragraph 6.4.8 states:
"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;…
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".

Comparing aerial photos from 2021 and 2015 shows that large tree west of the garage and thick hedge southeast of the eastern access have been removed to facilitate the proposed development. The Ecologist failed to describe the tree and biodiversity habitat removal and features of value to protected species were undertaken prior to submission to facilitate the demolition and construction proposed. The PRA, Planning Statement don't include photos, a habitat plan or details of existing and proposed boundary treatments and features which should have been included in the Site Plan according to local and national validation

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guidance. I disagree with the application form that there are no trees or hedges impacted by the proposals because of the proposed development of the access road and query whether development has commenced.

According to CP3 planning permission will be granted for proposals that: c) Have no detrimental impact upon important ecological, heritage landscape (including river valley) or geological features or water courses. And d) 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 of Design and Access Statements, clear and informative plans, elevation and streetscenes. Policy CP7 requires that development which may harm habitats or species of principle importance or whether directly or indirectly, will be only permitted where compensation measures to offset the scale and kind of losses are provided. According to policy TB23 planning permission will only be granted where they comply with policy CP7 and also demonstrate how they provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing and ensure that all developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors.

The bat reports do not take account of the impact to wildlife including foraging and commuting bats of the tree felling and hedge and shrub clearance. In accordance with paragraph 187 of the 2024 NPPF and local plan policy a landscaping plan should be provided either prior to determination or secured by condition, to ensure compensation planting to maintain the favourable conservation status of bats on the site and the vegetation clearance undertaken will not lead to a permanent net loss of biodiversity habitat.

Conditions & Reasons (if required)

Condition: No works shall commence until a licence for development works affecting bats has been obtained from Natural England and a copy of the licence and approved mitigation strategy, (or an email from Natural England that the site has been registered under a Bat Mitigation Class Licence or Bat Earned Recognition Class Licence) have been submitted to the council. Thereafter the approved mitigations measures shall be maintained in accordance with the approved details.

Reason: To ensure that 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 detailed wildlife-sensitive lighting proposals designed in accordance with best practice including Bats and Artificial Lighting at Night' Guidance Note GN 08 / 23 shall be submitted to and approved in writing by the local planning authority. The proposals shall:

a) identify those areas/features on site that are particularly sensitive for bats, birds and invertebrates and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.
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 the commencement of the development full details of both hard and soft landscape proposals shall be submitted to and approved in writing by the local planning authority. Soft landscaping details shall include planting plan, schedules of plants, noting species, planting sizes and proposed numbers/densities numbers of trees/shrubs to be planted, and any existing trees or shrubs to be retained and an implementation timetable.
Any trees or plants which, within a period of 10 years from the date of the planting (or within a period of 5 years of the occupation of the buildings in the case of retained trees and shrubs) die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species or otherwise as approved in writing by the local planning authority.
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: No retained tree, hedge or shrub shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the written approval of the local planning authority. If within a period of 10 years from the date completion development of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted at the same place, unless the local planning authority gives its written consent to any variation.
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: No building, enlargement or alterations permitted shall be carried out nor enclosure, swimming or other pool, or container for the storage of oil or liquid petroleum gas shall be erected within the curtilage of the dwelling house hereby permitted without the express permission in writing of the local planning authority.
Reason: To ensure implementation in accordance with the Biodiversity Gain Plan and that biodiversity habitat is retained on-site in the long-term and protected and priority species are not affected. Relevant policy: NPPF 2024 Section 15, Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015. Local Plan Core Strategy policies CP3, CP7 and Managing Development Delivery policy TB23.

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Informative: This permission does not convey or imply any approval or consent for protected species required under The Wildlife and Countryside Act 1981 as amended) or The Conservation of Habitats and Species Regulations 2017 (as amended). The applicant is advised to contact an ecological consultant contacted for further before works can proceed.			
Date:	18/05/2026	**Signed:**	T Cuss