

# MEMORANDUM

|                             |                                                                                                |                |        |
|-----------------------------|------------------------------------------------------------------------------------------------|----------------|--------|
| <b>From:</b>                | Tina Cuss<br>Ecology Officer                                                                   |                |        |
| <b>Service</b>              | WBC Ecology                                                                                    | <b>App No:</b> | 251994 |
| <b>Address:</b>             | 24 Falstaff Avenue, Earley, Wokingham, RG6 5TQ.                                                |                |        |
| <b>Proposal:</b>            | Householder application for the proposed erection of a rear orangery with glazed roof lantern. |                |        |
| <b>Type of Development:</b> | Other Householder                                                                              |                |        |
| <b>Site Visit Made:</b>     | 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 reviewed the revised drawing Existing-Proposed (Home Plan Design Service, Dwg 25/3308/04 December 2025).

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:

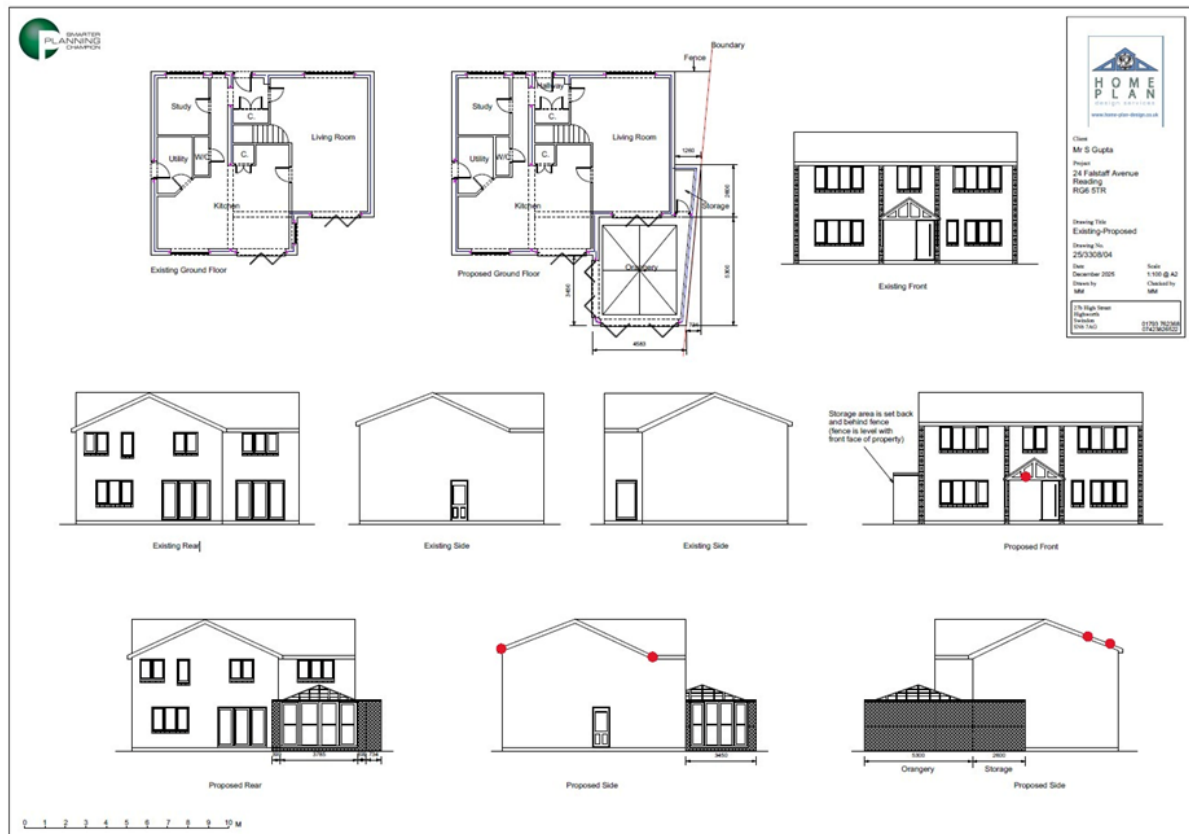
- Gaps in mortar at the gable verge
- Gaps where the bargeboard of the main roof meets the soffit of the northwestern roof
- Gaps between the felt and wall where the porch joins the house.

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.

According to the revised proposals plan and subsequent email from the Ecologist, I understand that the proposed works are limited to only construction of an orangery. The changes to the front elevation and the roof and first floor have been withdrawn, and can not be implemented unless a further householder planning application is made to the LPA.



According to Local Plan policy CP3 and CP7 to grant planning permission applications are required to demonstrate, through the submission of clear and informative plans, that proposals will maintain or enhance the ability of the site to support fauna and flora including protected species. Development needs to demonstrate that mitigation measures can be put in place to prevent damaging impacts to species of principle importance and features of importance for wildlife, whether directly or indirectly. MDD policy TB23: Biodiversity and Development states planning permission for development proposals will only be granted where they comply with policy CP7, and also demonstrate how they provide opportunities to incorporate new biodiversity features or enhance existing.

Bats are sensitive to light pollution, and the PRA report does not refer to the disturbance and deterrent impacts the lighting on the porch and the rear elevation may have on protected species. Increase in light pollution might can mean birds and nocturnal species are disturbed 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.



Light pollution and disturbance from the orangery to bat foraging, commuting, and the access to the confirmed roost in the loft or cavity walls must be minimized, and bat mitigation strategy should be provide to ensure the LPA can secure mitigation measures in line with planning policy. To compensate the increase in light pollution and disturbance and use of first floor floodlights, a biodiversity sensitive lighting scheme and a mitigation strategy should be approved and implemented to ensure long term retention, maintenance and enhancement for bats on the site.

### Summary

In accordance with paragraph 187 and 198 of the NPPF 2024, and Local Plan policy if planning conditions securing a bat-sensitive lighting strategy and details of avoidance of a scheme of mitigation measures (such as lighting and filters that will be included in the roof of the orangery, and changes to first floor floodlights) ensure maintenance of the retained confirmed bat roost are imposed there are no ecological objections to the revised development as proposed in Existing-Proposed Dwg 25/3308/04.

### Conditions & Reasons (if required)

**Condition:** Prior to commencement of development, a lighting design strategy for biodiversity for designed in accordance with BCT best practice, including in accordance with [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 strategy shall:

- a) identify those areas/features on site that are particularly sensitive for bats and birds 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: NPPF 2024 Section 15 & paragraph 198, Core Strategy policies CP1, CP3, and CP7 and Managing Development Delivery Local Plan policy TB23.

**Condition** Prior to the commencement of the development details mitigation and biodiversity enhancements shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be implemented, installed and permanently maintained as approved.

**Reason** To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 187, Core Strategy policies CP1, CP3, and CP7 and Managing Development Delivery Local Plan policy TB23.

**Informative** This permission does not convey or imply any approval or consent required under The Conservation of Habitats and Species Regulations for protected species 2017 (as amended) and The Wildlife and Countryside Act 1981 (as amended). All contractors working on site should be made aware bats are a protected species under the Conservation of Habitats and Species Regulations 2017 (as amended) and The Wildlife and Countryside Act 1981 (as amended) and provided with the contact details of a relevant ecological consultant.

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| <b>Date:</b> | 26/01/26 | <b>Signed:</b> | T Cuss |
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