

MEMORANDUM

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 reviewed the plans and elevations submitted in support of the application and site and local planning history. No bat survey has been submitted with the application. According to the WBC Local Validation List, the requirements for a full planning approval would be a useful indicator as to what may be required Planning in Principle applications. The Site is identified on the Borough Constraints Map as supporting habitat suitable for bat roosts. Surveys in 2025 confirmed the property hosts two Soprano pipistrelle bat roosts. The development proposals require dismantling 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.

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 a protected species derogation licence, 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.

- 4. Possess or advertise/sell/exchange a bat of a species found in the wild in the EU (dead or alive) or any part of a bat.
- Intentionally or recklessly obstruct access to a bat roost.

In order for the LPA to have regard for bats and ensure a European Protected Species Licence is secured, bat survey and a mitigation strategy must be submitted with the current application. Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System 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."*

I refer you to the comments I have made on householder application 253129. I understand this application is made by Tony Holt Design on behalf of a different owner, and that my comments have not been made public. However, the Preliminary Roost Assessment and Bat Survey Report that confirm the house supports two bat roost are published on the LPA planning pages. The PRA report paragraph 4.1.4 stated *"This report has been produced to advise **the client's Architect** of the findings and recommendations and is only valid until the Bat Roost Characterisation Survey recommended within the report has been carried out"*.

It is therefore not clear why the architectural designer has not made their client either aware of the potential for bats, the need for all the current planning applications made by the new owner to be supported by bat emergence surveys and enhancements for wildlife and protected species. I note that the bat reports must however not be re-submitted without the permission of the Ecologist and the existing bat survey may only be updated by KJF Consultancy.

Contrary to BS42020 paragraph 6.4.8 the previous ecologist failed report on tree and biodiversity habitat removal or the alteration or loss of biodiversity features, such as hedgerows, and features of value to protected species or described and explain the cause for the clearance. The applicant failed to propose compensation planting to maintain the favourable conservation status of bats on the site and ensure that the vegetation clearance undertake to facilitate development on the site will not lead to a permanent net loss of biodiversity habitat and compensation planting can be secured. The bat survey reports submitted with the current application must therefore ensure landscaping proposals are agreed with the applicant and proposed in a landscaping plan which should preferable be submitted prior to determination to avoid delay in the grant of a bat mitigation licence and ensure compliance with WBC policies CP3, CP7 and MDD TB23 and the NPPF.

Summary

If neither new, or updated versions of the previous 2025 bat surveys and a mitigation strategy that taking account of the current proposals are submitted, the application should be refused on grounds of lack of ecological information, impact to protected species and failure to comply with Section 15 of the 2024 NPPF, and Local Plan policies CL3, CL7 and MDD TB23.

Conditions & Reasons (if required)			
Awaiting bat surveys and mitigation enhancement proposals.			
Date:	14/05/2026	Signed:	T Cuss