

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	261182
Address:	12 South Drive, Sonning, Wokingham, RG4 6GB.		
Proposal:	Householder application for the proposed erection of a two storey front and side extension, part single storey part two storey rear extension, single storey rear extension with pitched roof, erection of terrace, garage conversion to create habitable accommodation plus changes to fenestration and erection of front gates.		
Type of Development:	Other Householder		
Site Visit Made:	No		

Summary Of Recommendations

- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☐ Request further information before determination as **stated below**
- ☒ Negotiate the amendments **stated below**; or
- ☐ Objection due to the reason(s) **stated below**

Comments On Proposal

I have read the Bat Survey (GS Ecology, Ref ECO4092, 15 July 2026), Preliminary Roost Assessment (John Wenman Ecological Consultant, Ref R3190_PRA_a, April 2026), and Great Crested Newt Habitat Assessment (Joh Wenman, R3143_GCN_a, April 2026) and reviewed the plans and elevations submitted in support of the application.

All species of bats are protected under The Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 as amended). Under this legislation it is a strict liability offence to injure or destroy a bat or to disturb damage or destroy the resting place of a bat. Under this legislation the UK is obliged to fully take into account bats within the planning process and the level of bat activity on-site must be fully assessed prior to the assessment the planning application.

All wild birds are granted legal protection under the WCA 1981 (as amended). This legislation protects the birds, their eggs and nests whilst being built or in use. A bird was heard nesting above the eastern chimney.

The PRA inspection potential roost features including raised and uneven roof tiles, gaps in ridge and verge, gaps behind uneven hanging tiles and between overhanging timber eaves and walls. While the Ecologist states that their desk study included pre-existing bat survey reports, they did not assess the record of pipistrelle bats emerging from 12 South Drive recorded by Hampshire Ecological Services in 2019 submitted in support of application 200757.

Bat emergence surveys were completed on 19 May, 17 June and 09 July 2026 in general accordance with the Good Practice Guidelines. During the first survey 1 Common pipistrelle emerged at 21.02 from the timber frame on the front elevation, 1 Soprano pipistrelle emerged from the hanging tiles on the southern gable and a single Common pipistrelle emerged at 21.34 from Roost A on the front elevation. Bat activity was high during all three dusk surveys. 89 passes were recorded from at least 7 different species of bat during the second and 101 passes from 6 species in the third dusk survey. I agree that Roost A and Roost B are likely to be small day roosts, but I am concerned that the Ecologist's assessment of site status did not also take account of pipistrelle roosts recorded by Hampshire Ecological Services. Contrary to my recommendation GS Ecology have not completed a local bat group or TVERC data search and appear not to have been aware that Pipistrelle bats were recorded emerging from 12 South Drive.

I agree Bat Survey section 4.6 that as both bat roosts will be lost a licence from Natural England for development works affecting bats will need to be obtained before the works commence.

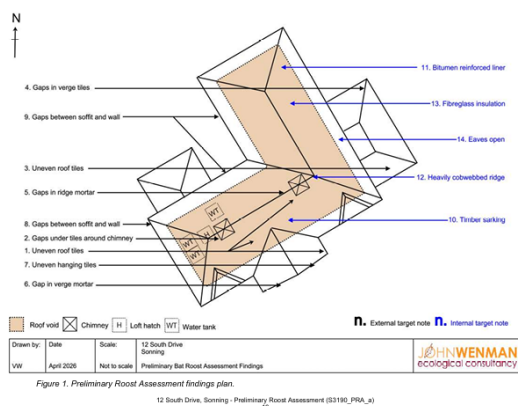


Figure 1. Preliminary Roost Assessment findings plan.

12 South Drive, Basingstoke - Preliminary Roost Assessment (S2190_PRA_s)

Figure 2 - Locations of bat roosts at 12 South Drive



The application form has been completed incorrectly, and it is inaccurate to claim that there are no hedges or trees that will be removed or pruned to carry out rear extensions and the wall construction and car parking proposals. The Ecologist states that the *“habitats surrounding the main house, and, across the gardens are likely to be of importance for commuting and foraging bats”*. I previously requested that the Block Plan is annotated and the detail of the existing front hedge, boundary features and trees shown for the Ecologist assess the impact on bat commuting and feeding and mitigation and the loss and detrimental impact to the wildlife corridor.

The Ecologist states that the highest numbers of bats are found in areas with abundant invertebrates. Bats, especially the smaller species, tend to follow linear features (such as hedgerows and tree lines) to their foraging habitats and will often not cross open spaces. *“A gap of 10m in a linear feature will often not be crossed by bats, and it is important that developments do not create such gaps if linear features are used by bats”*.

GS Ecology however, not assessed the impact of removal of front hedge, the Eucalyptus tree in rear garden, climbers on the house, shrubs and hedgerow on the northeast boundary and other shrubs and tree confirmed whether this will be protected and retained in order to ensure maintenance and enhancement of the bat population. I previously requested that the Block Plan is annotated and the detail of the existing front hedge, boundary features and trees shown so that the Ecologist could accurately assess the impact on bat commuting and feeding and mitigation and the loss and detrimental impact to the wildlife corridor. In the absence of this assessment the detrimental impact on protected species and lack of mitigation is contrary to planning policy and the layout should be amended to minimize loss of shrubs and trees and retain both southern and northeastern hedgerows and provided compensation planting for bats.

Installation of four bat access tiles in the roof of the entrance hall are proposed to compensate the loss roosts and that only bitumen 1F bitumen felt or membrane which has a Natural England snagging propensity test certificate must be used. Other roofing membranes are harmful and have been known to kill bats and must be avoided.

I am concerned the Ecologist has taken no account that the Block Plan doesn't show trees and hedges retained and has failed to consider the lost boundary hedges to facilitate a wider gate and replacement wall, and the Eucalyptus tree and trees, climbers and mature shrubs adjacent and within the footprint of the rear extension. ECO4092 proposes that 2 bat boxes will be installed on suitable trees in the rear garden, without a plan to identifying if any trees are retained and proposals for compensation planting and permanent retention of commuting routes. Removal of hedges and trees is not unavoidable and should be retained in line with planning policy. As requested in my previous comments the design of the wall and gate and increased/ parking need to be reviewed, the biodiversity mitigation hierarchy applied, the loss of biodiversity habitat reduced as far as possible and wildlife corridors are retained along the front boundary and northeast side elevation.

To recommend approval the parking and wall construction proposals the Block Plan should be revised, and a Tree Survey should be submitted to ensure the losses are minimized and all retained habitats are protected and retained in the long term to safeguard corridors for bats.





I previously recommended that in line with the Good Survey Guidelines, the impacts of external lighting should be assessed in the roost characterisation survey, and appropriate mitigation measures proposed to avoid and reduce negative impacts on light pollution be included in the additional submissions. While GS Ecology advise that care is taken to ensure that any new lighting does not illuminate the habitats surrounding the house and across the gardens of importance for bats, they've failed assess the impact of existing external and flood lighting including the inappropriate floodlight on the gable end next to the Soprano pipistrelle bat roost. In order to recommend adequate mitigation can be secured to maintain the favourable conservation status of bats using the site and provide enhancement in line with Local Plan policy and the NPPF, existing lighting must be revised as well as all new lighting avoiding important foraging and commuting areas on the house or in the garden. The lighting strategy must take account of the increase in glazing proposed, including French doors, roof lights and in particular the front elevation where the hanging tile roost features are replaced with an expanse of glass and the introduction of first floor balconies. In accordance with BS42020:2013 D3.5 submission, approval and implementation of a biodiversity sensitive lighting scheme must therefore be secured by condition to prevent illegal deterrence of bats and obstruction of roosts. I advise revision of the existing lighting is agreed with the consultant ecologist and amended as soon as possible to prevent illegal obstruction and negative impacts to bats.

Summary

To recommend compliance with the NPPF and WBC planning policy to assess, justify and compensate unavoidable impacts on biodiversity habitat and protected species a Tree Survey and Tree Protection Plan, revised Block Plan, assessment for biodiversity habitat loss impact on bats a revised layout, amended car parking

proposals and mitigation for light pollution and compensation planting for habitat loss which is shown to be unavoidable or should be submitted before determination.

Conditions & Reasons (if required)

Awaiting a Tree Survey and Tree Protection Plan, revised Block Plan, amended car parking proposals and assessment cumulative impact habitat loss.

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, (or an email from Natural England that the site has been registered under a Bat Mitigation Class and the approved mitigation strategy 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 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. These details shall include, as appropriate, proposed finished floor levels or contours, means of enclosure, car parking layouts, other vehicle and pedestrian access and circulation areas, hard surfacing materials and minor artefacts and structure (e.g. furniture, play equipment, refuse or other storage units, signs, lighting, external services, etc). Soft landscaping details shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate, and implementation timetable.

All hard and soft landscape works shall be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a timetable approved in writing by the local planning authority. Any trees or plants which, within a period of five years after planting, are removed, die or become seriously damaged or defective, shall be replaced in the next planting season with others of species, size and number as originally approved and permanently retained.

Reason: To ensure that the development does not result in a net biodiversity habitat loss and that protected and priority species are maintained and enhanced. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policies CC03 and TB23.

Condition: Prior to commencement of development a lighting design strategy for biodiversity designed in accordance with best practice including 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, mammals, 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: NPPF 2024 paragraph 198 and Section 15 (Conserving and Enhancing the Natural Environment), Core Strategy policies CP1, CP3 and CP7 and Managing Development Delivery Local Plan policy CCO3, TB21 and TB23.

Condition:

a) No development or other operation shall commence on site until a scheme which provides for the retention and protection of trees, shrubs and hedges growing on or adjacent the site in accordance with BS5837: 2012 has been submitted to and approved in writing by the local planning authority (the Approved Scheme); the tree protection measures approved shall be implemented in complete accordance with the Approved Scheme for the duration of the development (including, unless otherwise provided by the Approved Scheme) demolition, all site preparation work, tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening or any other operation involving use of motorised vehicles or construction machinery.

b) No development (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening or any other operation involving use of motorised vehicles or construction machinery) shall commence until the local planning authority has been provided (by way of a written notice) with a period of no less than 7 working days to inspect the implementation of the measures identified in the Approved Scheme on-site.

c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within an area designated as being fenced off or otherwise protected in the Approved Scheme.

d) The fencing or other works which are part of the Approved Scheme shall not be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery and surplus materials removed from the site, unless the prior approval of the local planning authority has first been sought and obtained.

Reason: To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of biodiversity value to the area, and to allow for verification by the local planning authority that the necessary measures are in place before development and other works commence Relevant policy: Core Strategy policy CP3 and CP7 Managing Development Delivery Local Plan policies CC03, TB21 and TB23.

Date:

06/08/26

Signed:

T Cuss