

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260316
Address:	14 Norfolk Close, Wokingham, RG41 3AF.		
Proposal:	Householder application for the proposed erection of a first floor side extension.		
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 reviewed the document entitled Preliminary Roost Assessment which I have to assume has been prepared by the Agent on behalf of the Applicant.

The site is identified as being located in an area suitable for bat roosting. As required by the WBC Local Validation List 2025, the application should not have validated without a provision of a Bat Survey prepared by a licensed Ecologist. The Agent has undertaken no desktop study; the photographs appear to come from Google Streetview and were very clearly not taken on 30 January 2026. The photos are not clear enough to prove there are no access gaps or potential roosting features, and I disagree that the soffits are in good condition. There is no evidence the roof tiles and ridge have been surveyed externally e.g. with binoculars from a ladder. The report includes no internal inspection at all of the loft, including the cavity walls that will be impacted by the addition of a first-floor extension, the removal of soffits and roof tiles, and obstruction of any access for bats on the existing gable end. It is unclear if the Agent has ever visited the site.

BAT SURVEY:

Development which proposes modifications or alterations to a roof or demolition, are likely to require a daylight bat survey/report to be submitted with the application (in accordance with the EC Habitats Directive 1992. This must be completed in the last 12 months by a licensed ecologist and cannot be carried out by the applicant/agent.

All bats are fully protected by The Wildlife and Countryside Act 1981 (as amended) and by The Conservation and Species Regulations 2017 (as amended).

In summary the legislation combined makes it an illegal offence without first having obtained the relevant licence from Natural England to:

- damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a bat;
- deliberately, intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair the ability of bats to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate' or to affect significantly the local distribution or abundance of the species; and
- deliberately kill, injure or take any bat.

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 Agent hasn't demonstrated that the property has “*negligible potential*” for bats and that there are no “*suitable access points or roosting features*”. Soffits are not in good condition. The assessment that there is negligible potential directly contradicts the recommendation that the property has “*low potential*” (see Good Practice Table 4.1) In the absence of inspection by a qualified ecologist, it is not possible to confirm there are no potential roosting features, particularly for crevice-dwelling bats and therefore confirm absence of bats. No mitigation is proposed avoid and reduce potential impacts, and the PBRA does not demonstrate the Owner and Agent are aware of the legal protection afforded to all species of wild bat in the UK.



Table 4.1. Guidelines for assessing the potential suitability of proposed development sites for bats, based on the presence of habitat features within the landscape, to be applied using professional judgement.

Potential suitability	Description	
	Roosting habitats in structures	Potential flight-paths and foraging habitats
None	No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).	No habitat features on site likely to be used by any commuting or foraging bats at any time of the year (i.e. no habitats that provide continuous lines of shade/protection for flight-lines, or generate/shelter insect populations available to foraging bats).
Negligible*	No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.	No obvious habitat features on site likely to be used as flight-paths or by foraging bats; however, a small element of uncertainty remains in order to account for non-standard bat behaviour.
Low	A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions ^a and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats ^b).	Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub.

Local authorities have a statutory duty under The Conservation and Species Regulations 2017 (as amended) to have regard to requirements in the exercise of their functions. The presence or absence of protected species, and the extent to which they could be affected by the proposed development, should be established before planning permission is granted, otherwise material considerations might not have been considered in making the decision.

WBC 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 of Design and Access Statements, clear and informative plans, elevation and streetscenes. According to CP7 development which may harm species of principle importance will only be permitted where

mitigation measures can be put in place to prevent damaging impacts or appropriate compensation measures to offset the scale and kind of losses are provided.

The NPPF 2024 paragraph 187 states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs.

Summary In the absence of an Ecologist's survey demonstrating that bats will not be impacted, a planning condition securing implementation of the development in strict accordance with mitigation avoidance strategy should be imposed.

I request in future that no bat survey prepared by the Agent is validated by WBC. Up-to-date photos of the condition of any potential roosting features and comprehensive survey carried out by a qualified Ecologist must be provided.

Conditions & Reasons (if required)

Condition: All excavations or building works, works affecting the roof, loft, soffits or gable end wall, or associated operations shall be undertaken under the supervision of an appropriately qualified ecologist (full member of CIEEM and or a Natural England Bat licence holder with experience of supervising demolitions where there is a risk of bats being present) following a method statement agreed between the ecologist and the contractor. The method statement shall detail all relevant techniques, including the careful removal of tiles by hand, and the procedure to follow should bats or signs of bats be found. Should bats or recent evidence of bats be found then no development is to commence until any relevant licence have been obtained from the Natural England and a copy submitted to and approved in writing by the council. **Reason:** To ensure that protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 Section 15, Core Strategy policies CP1, CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

It is possible that protected species may be encountered once works commence. I recommend 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.

Informative: This permission does not convey or imply any approval or consent required for protected species under The Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 (as amended).

Date:	31/03/26	Signed:	T Cuss
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