

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251619
Address:	7 Rowan Close, Wokingham, RG41 4BH.		
Proposal:	Householder application for the proposed erection of a two-storey 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 read the Preliminary Roost Assessment (ACP, Ref 32032, 25 July 2025) and reviewed the plans and elevations submitted in support of the application.

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 in 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 PRA exterior inspection found a few raised or broken hanging tiles which could potentially be used as access points for roosting bats or support crevice-dwelling bats. In addition, there are some small cracks visible in the soffit boxes which could be used by crevice-dwelling bats. The interior inspection recorded light ingress and broken blocks leading to internal voids. One ventilation point was assessed, and no physical bat evidence was found.

I support the Ecologist's conclusion that property has low bat roost potential and that the presence of bats cannot be rule out or confirm without further survey. The recommendation that the emergence surveys are undertaken prior to the commencement of works instead of determination is contrary to planning policy, guidance and Circular 06/05: 'Biodiversity and Geological Conservation - Statutory Obligations and their Impact within the Planning System'.

Table 6: Site features and descriptions linking to photos in Appendix B.

Building Reference	Internal or external	Description (if applicable)	Suitability for Bats	Use by birds	Bat Signs, Access Points and Features
A	External	Building exterior (tiled gable)	Low	None recorded	Raised tiles could act as an access point for roosting bats or support crevice-dwelling bats.
B	External	Soffit box	Low	None recorded	Small gaps in soffit boxes could act as access points for roosting bats.
C	External	Building exterior (tiled gable)	Low	None recorded	Raised tiles could act as an access point for roosting bats or support crevice-dwelling bats.
D	External	Building exterior (tiled gable)	Low	None recorded	Raised tiles could act as an access point for roosting bats or support crevice-dwelling bats.
E	External	Building exterior (interlocking tile roof)	Low	None recorded	Raised tiles could act as an access point for roosting bats or support crevice-dwelling bats.

According to WBC Local Plan Policy CP3 planning permission will be granted for proposals that 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 to the criteria.

Circular 06/05 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. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.” In this case, there are no “exceptional circumstances”.

In the absence of further information and clarification whether the potential roosting features recorded in the PRA survey will be protected and retained approval of the application without a bat mitigation strategy would not be contrary to planning policy.

Summary

The application should not be approved unless further information has been submitted to confirm or rule out the presence of, and impact to bats, and where appropriate proposals for detailed mitigation and enhancement measures.

Conditions & Reasons (if required)

Awaiting a bat emergence survey and/or mitigation avoidance strategy.
If the application is subsequently approved, I am happy to recommend a planning condition to secure implementation of a and enhancement for bats.

Date:	18/09/25	Signed:	T Cuss
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