

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252342
Address:	Longwater, Longwater Lane, Finchampstead, Wokingham, RG40 4NR.		
Proposal:	Householder application for the proposed erection of a first-floor rear extension incorporating a flat roof section and a rear terrace enclosed by 1800mm obscurely glazed side balustrades and a 1100mm glazed rear balustrade, alongside the replacement of the existing front dormer with a new dormer of revised dimensions, and the alteration of the main roof pitch with new anthracite zinc cladding and slate tiles to match the existing dwelling.		
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 (Elite Ecology, Final Report V1 28 May 2025) and Bat Emergence Survey Report (Elite Ecology, V1 September 2025). I have also reviewed the plans and elevations submitted in support of the application.

All British species of bats and their roosts are fully protected by The Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 (as amended). This legislation makes it a criminal offence to deliberately or recklessly to destroy, damage or to obstruct access to their roosts, or to disturb, kill or injure, capture or disturb bats, without first having obtained the relevant licence 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.

According to the Preliminary Roost Assessment (PRA) there are gaps under the slate roof tiles on the southern and northern elevation, and gaps behind the wooden fasciae on the western elevation which are potential roosting features for crevice-dwelling bats. There is dense ivy growing on the western elevation of the main section of the house, which may be utilised by roosting bats. There are gaps above the door of the garage southern elevation section, which could be utilised as an

access point by protected species. The Ecologist recorded presence of sensed artificial lighting on both the northern and the southern elevations of the building. Other external features noted on the building were chimneys, drainpipes, fasciae, flashing, guttering, and soffits.

Bat emergence and roost characterisation surveys were completed in June, July and August 2025 in line with Bat Conservation Trust Good Practice Survey Guidelines.

One Soprano pipistrelle was identified emerging from the house on the southern elevation through the Ivy. Brown long-eared, Common pipistrelle, Noctule, Serotine, Daubenton's, and Soprano pipistrelle were recorded or observed using the site for foraging and commuting.

Figure 4: An image showing the point of emergence of soprano pipistrelle bat on the southern elevation of B1 (red circle).



Figure 3: An aerial photograph of the surveyed building (red outline) and the surveyor locations (yellow stars). The soprano pipistrelle bat emergence point is noted by blue stars and the dashed blue lines denote common bat flight paths.



Figure 6: An aerial photograph of the surveyed building (red outline) and the surveyor locations (yellow stars). The dashed blue lines denote common bat flight paths.



I am satisfied that the survey effort and methodology are adequate for the Ecologist to conclude that the house supports a small Soprano pipistrelle day roost. I agree to prevent illegal loss disturbance of bats and the confirmed bat roost, a Natural England European Protected Species Licence is needed. A licenced ecologist must undertake supervised dismantling of the roof and fascia accompanying building contractors in inspecting the structure by hand and must ensure that no hibernating bats are harmed by the works.

According to the proposals drawings the potential roosting features and access points will not be retained. A minimum of three integrated [Eco Bat Boxes](#) (or similar equivalent) must built into the house with the agreement of the contractor, BMCL licence holder and supervising ecologist. Breathable roofing membranes (BRMs) can cause entanglement and injury and kill bats. Only Type 1F bitumen felt or membranes which have been issued with the certificate that proves the roofing membrane 'snagging propensity test' may be used. Any new timbers must only be treated with chemicals approved for use in bat roosts.

Artificial lighting light around compensatory roosting features must be avoided. In line with the proposals, where artificial lighting can be demonstrated to be necessary, a bat-sensitive lighting plan with PIR sensors should be secured by condition. The lighting guidance provided in BES Appendix C is contrary current best practice; and Section 7 in both reports is out-dated and fails to refer to UK Bat Mitigation Guidelines, and relevant CIEEM and British Standards. I therefore request BES Appendix C is amended before it is issue to the applicant's contractors and the architect is advised that any necessary external lighting must comply with current best practice including [Bats and Artificial Lighting at Night Guidance Note GN 08 / 23](#).

While there are trees on adjoining properties which are within falling distance of the proposed development and hedges on the property, according to the application form no trees or hedges need to be removed or pruned in order to carry out the development. To ensure the development will not negatively impact bat foraging and commuting and the status of populations on the site is maintained as assessed, a planning condition should secure retention of boundary hedges and protection of tree Root Protection Area during site set-up and construction.

Conditions & Reasons (if required)

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 Licence) and the approved mitigation strategy have been submitted to the council. Thereafter mitigations measures detailed in the licence shall be implemented and maintained in accordance with the approved details.

Reason: To ensure that bats, a material consideration, are not adversely affected by the development. Relevant policy: NPPF Section 15, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Works are to be carried out in full accordance with the protected species Site Enhancements recommended in Section 5.2 of the Preliminary Roost Assessment (Elite Ecology, Final Report V1 28 May 2025). Within one month of substantial completion a short closing-out report demonstrating that the ecological mitigation and enhancement measures have been implemented to the satisfaction of the Owner's Ecologist is to be issued to the council.

Reason: To ensure no adverse impacts and secure benefits for protected and priority species are not adversely affected by the proposals. Relevant policy: Paragraph 187 of the NPPF, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: No removal of trees or shrubs, brambles, ivy and other climbing plants, or works to buildings or structures that may be used by breeding birds that may be used by breeding birds shall take place between 15 February and 15 September inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds' nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

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.

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Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals and secure the protection of trees, shrubs and hedges which are of biodiversity value growing within the site throughout the time that development is being carried out,. Relevant policy: NPPF Section 15, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: Prior to occupation a 'lighting design strategy for biodiversity' for designed in accordance with best practice including in accordance with Bats and Artificial Lighting in the UK' 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, 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 bats, a material consideration, are not adversely affected by the development. Relevant policy: NPPF Section 15 and paragraph 198. Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Date:	07/11/25	Signed:	T Cuss
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