

Memo

To: Huimin Chen

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 13 January 2026

Re: Planning application ref: PL/25/1832

Address: 34 RICHMOND ROAD, CAVERSHAM, READING, RG4 7PR

Description: Loft Conversion into habitable space; New front entrance porch and rear extensions.

The application site is a detached bungalow located within a residential area of Caversham, Reading/ The proposal involves a significant loft extension which will require extensive alterations to the existing roof and includes the removal of two chimneys.

The building lies adjacent to a designated Green Link (Local Plan Policy EN12) and is located within habitat that is suitable for foraging and commuting bats. Furthermore, we have records of bat roosts nearby.

The building may possess features that could provide potential roosting opportunities for bats and as such, the proposed works may affect roosting bats. A bat survey report prepared by a suitably qualified ecologist will therefore be required before the application can be determined. Further details are provided below.

The applicant has also submitted a document entitled “4010-34 RICHMOND ROAD-RBC Sustainability Statement (Shaun & Tanner, December 2025)” This reads:

“As an existing building there will be no habitat impact. A bat survey confirmed no presence of bats or significant impacts.”

However, this document has not been supplied and this statement is therefore not supported. The applicant will need to either provide the bat survey referred to or withdraw/correct this statement.

Further details of the bat survey required are provided below.

Legislation

All species of bats receive protection under UK law and it is a criminal offence under the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2010 (The Habitat Regulations), 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 the Statutory Nature Conservation Organisation (the SNCO - Natural England in England).

Planning policy

Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (this document was not revoked by the National Planning Policy Framework) 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.”

Survey requirements

A presence / absence bat survey is normally undertaken in two stages, firstly a preliminary roost assessment, whereby the inside and outside of the building is surveyed for bats and signs of bats. This survey can be undertaken at any time of year.

If bats are found or features within the building have the potential to support roosting bats and these will be affected by the proposals, further dusk emergence and or pre-dawn re-entry surveys during the bat active season (i.e. between May and the end of August/ sub optimally until mid-October) would need to be carried out. The applicant would then need to submit the results of the survey(s) along with any associated mitigation strategy prior to determination of any application.

Surveys should be carried out by suitably experienced ecologists who are a member of a professional organisation such as the Chartered Institute of Ecology and Environmental Management and / or are licensed or accredited by Natural England to survey bats.

Summary

The building may host roosting bats and to confirm whether this is the case, and if so, how bats will be affected by the proposals to convert the loft, a bat survey will need to be carried out. The survey will need to be provided prior to the application being determined.