

Memo

To: Anthony Scholes

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 9 March 2026

Re: Planning application ref: PL/25/1797

Address: Eaton Court, 104-112 Oxford Road, Reading, RG1 7FU

Description: Two-storey upward extension to provide 12 flats (2 x 3-bed, 4 x 2-bed, 6 x 1-bed), cycle and refuse storage, and associated works

The application is for two additional floors on an existing building in central Reading to provide additional accommodation

A bat emergence survey has been provided (Arbtech, November 2025). However there are a number of issues with this report and further information is required – these issues are listed below:

- 1) Preliminary Roost Assessment (PRA) - The report refers to a PRA to be read in conjunction with – this was carried out in July 2025. This has not been submitted as part of the application. The PRA must be provided before further comments can be made.
- 2) Number of surveys - The report includes references to roosts being “*confirmed after the third survey*”. However details of only two emergence surveys are provided and it is therefore unclear what survey effort has been undertaken. Please clarify whether a third survey was completed, and update the report to state clearly how many surveys were undertaken and when
- 3) Previous bat survey information. A previous bat survey undertaken in 2021 (Aspect Ecology, ref: 5710 BSA vf1 BB/LN/DS) indicated that the site was being used by bats with recorded emergences from two separate locations on the building. Please clarify if this survey has been considered within the current report, whether these two potential roosting features are still present and whether these locations were specifically monitored during the recent emergence surveys.
- 4) Surveyor locations. The tables included in the report refer to nine surveyors, however, the BERS plan (Appendix 1) appears to show only eight surveyors. Please can this be clarified and the location of all surveyors clearly shown to demonstrate that full coverage of the building has been achieved.
- 5) Mitigation and recommendations: – The report states that two bats emerged from the northern elevation of Building B1a. The proposed mitigation described appears to be to retain the roost features and to ensure that a non licenced mitigation plan/method of working is followed. This document has not been provided.

The report recommends that all scaffolding is placed so as not to obstruct or interfere with the roost access points. This represents a very general mitigation plan and there is currently insufficient detail to demonstrate how this will be feasibly achieved. More details are required on how scaffolding and construction works will be designed and managed to avoid blocking of the roost access points and to demonstrate that bats will not be disturbed.

- 6) Supervision. The report refers to works being supervised by a licensed ecologist but does not specify what type of ecological supervision is proposed – for example is this a full time or part time watching brief or a pre commencement supervision? Please confirm that these details will be fully detailed in the mitigation plan
- 7) Appendix 2 - Proposed plans: This is labelled as Proposed plans – however it is not clear how this plan relates to the ecology assessment or the location of the identified roost features. Please clarify the purpose of this plan – it may be that it can be used to demonstrate the relationship between proposed works and the confirmed bat roost features.
- 8) Endoscope inspection: The report refers to a “*endoscope inspection of any roosting features on the northern and eastern elevations immediately prior to works commencing*”. However based on the information in the report provided, it is not clear why the eastern elevation is included in the recommendation

Summary:

Currently the report does not provide enough detailed information for the LPA to be confident that the proposed mitigation approach is feasible and that works can proceed without a bat licence. The measures described in the document appear to be outline only and rely heavily on a bat mitigation plan to be provided in the future.

Given the presence of confirmed bat roosts, further information is required to demonstrate that the proposed works could be undertaken without blocking or disturbing roost access points. This information should include full details of the scaffolding exclusion zones shown alongside the exact roost and potential roost locations. Details of how the roost access areas will remain unobstructed are also needed along with confirmation that the roost locations will not be affected.

Until the above information has been provided and the points above addressed, the LPA cannot be satisfied that sufficient ecological information has been submitted to properly assess potential impacts on bats.