
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260446
Address:	95 Butts Hill Road, Woodley, Wokingham, RG5 4NT.		
Proposal:	Householder application for the proposed erection of a first floor side and part single part two storey rear 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 Bat Roost Assessment (GS Ecology, Ref ECO3968, 20 January 2026) and the Design and Access Statement (DJK Architecture, 17 February 2026). I have also reviewed the submitted plans and elevations.

95 Butts Hill Road is assessed as having 'high' potential to host roosting bats due to its location – in habitat of predominantly 'moderate' suitability for commuting and foraging bats, the presence of a number of features potentially suitable for use by roosting bats, and, the presence of low number of bat droppings were found underneath hanging tiles on the front elevation. The building has a number of features suitable for use by roosting bats, these include:

- A. Gaps between tiles below the south western roof hip.
- B. Gaps due to raised tiles and loosely fitted lead flashing around the shared chimney stack.
- C. Gaps under hanging tiles on the front bay window - bat droppings were observed behind the hanging tiles (approximately 10 bat droppings fell out when a tile was slightly lifted)
- D. Gap between lead flashing and brickwork at the front bay window

According to the PBRA *"the proposed side and rear extensions will not affect any of the features potentially suitable for use by roosting bats"*. Proposed Floor Plans No 20059/ 200 REV A (Feb 2026) also shows the hanging tiles as retained. While it appears the Ecologist has not read the Design and Access Statement (February 2026), the Architect states that *"to further articulate the relationship between old and*

new, the proposal incorporates fibre-cement cladding as a contemporary material finish. This will clearly distinguish the extension from the original dwelling”.

Photo 7 – [Feature C] Gaps under hanging tiles on the front bay window, and, Photo 8 – [Feature D] Gap between lead flashing and brickwork at the front bay window



Photos 9 and 10 – Bat droppings found under hanging tiles.

Photo 5 – [Feature A] Gaps between tiles below south western roof hip, and Photo 6 – [Feature B] Gaps due to raised tiles and loosely fitted lead flashing around the shared chimney stack.



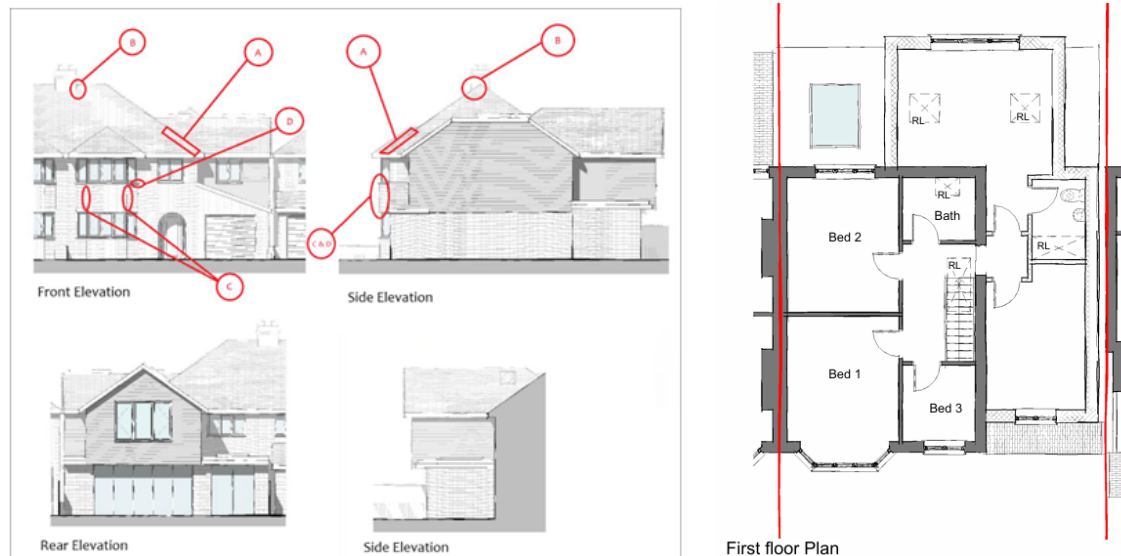
I am satisfied with the conclusion that the proposals do not include any changes or works to the front hanging tiles, and the bat roost and potential roosting features will not be affected. I agree that as it is likely that bats will roost in other parts of the building and the recommended Precautionary Working Measures must be implemented during the works and secured by planning condition. The measures include:

- A. Prior to dismantling and starting construction works briefing by a suitably qualified ecologist of contractors about the potential presence of bats, and how to remain vigilant for bats and droppings.
- B. All tiles and roof linings are to be removed carefully by hand under the supervision of a suitably qualified ecologist and checked for bats.
- C. If bats are found, works will stop, an assessment will be made by the licensed bat ecologist, and any requisite licence will be obtained.

If there are any changes or works to or which affect the front hanging tiles or proposals to clad the front elevation further bat surveys needed and mitigation strategy must be submitted to and approved by the LPA as well as a copy of any European Protected Species Licence needed for the works to undertaken legally.

D.

Figure 3 - Proposed elevations showing how the features with potential to host roosting bats will be unaffected by the works



I note the Ecologist has not assessed the revised plans and elevations that include rooflights in the side and rear extensions, as well as the side extension flat roof. Confirmation is needed from the Ecologist that the addition of rooflights in the bathroom ceiling will not introduce any light in main loft void cavity roost around the retained chimney or affect any roosts accessible via PRA Feature A (Gaps between tiles below south western roof hip).

Artificial lighting can negatively impact bats as it can impede their ability to forage successfully and can deter bats from commuting across the property. To ensure any lighting disturbance on the confirmed roost and potential roost features is minimised, lighting should be directional towards the ground to avoid upward light spill, retained and installed only where it is required for health and safety purposes, and controlled by external motion sensor set on timers of 1 minute or less). In line with Bats and Artificial Lighting at Night' Guidance Note GN 08 / 23 any light spill must be directed away from the roof and front elevation, trees and shrubs use warm white spectrum.

The architect's D&A concludes that they "*believe this proposal represents a positive and sustainable enhancement to the site and trust it will be supported as a valuable contribution to the local built environment*". However, the Ecologist and Architect fail to refer to the impact of parking, plant, material and construction vehicles to the street tree, or to habitat removed to increase parking. BS42020 paragraph 6.4.8 states were relevant survey reports "*should also include reference to any evidence of material events occurring on site, either before or after ecological surveys have been carried out, for example:*

- a) *removal or management of vegetation, including trees;*
- b) *alteration or loss of other biodiversity features, such as hedgerows, ponds, ditches or buildings and features of value to protected species.."*

No compensation for the loss of the birch tree and shrub clearance in the front garden is currently. Unless inappropriate use of exterior lighting is avoided and light pollution is minimized the development proposals will not comply with the NPPF section 15 and paragraph 198, Local Plan policy CP3 c). The application should

demonstrate the proposals have no detrimental impact upon important ecological, heritage, landscape features, and maintain or enhance the ability of the site to support protected species. I would not agree that the development “*makes significantly improved use of the site*”. As the applicant has failed to propose provision of enhancements for biodiversity such as bird boxes or bat bricks, or reduce in light pollution.



Conditions & Reasons (if required)

Condition: Works are to be carried out in full accordance with the Precautionary Working Measures provided in Section 4.11-4.12 of the Preliminary Bat Roost Assessment (GS Ecology, Ref ECO3968, 20 January 2026) Within one month of substantial completion, a short closing-out report demonstrating that the Precautionary Working Measures and any further recommended enhancement measures have been implemented to the satisfaction of the Owner's Ecologist is to be issued to the council.

Reason: To ensure that bats, a protected and priority species which are recorded roosting in the property are not adversely affected by the proposals. Relevant policy: NPPF 2024 Section 15 Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Prior to occupation, a lighting design strategy for biodiversity for designed in accordance with best practice including in accordance with Bats and Artificial Lighting at Night' 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 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 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 protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 198 Section 15 Local Plan Core Strategy policies CP3 and CP7 and MDD Delivery policy TB23.

Date:	15/04/26	Signed:	T Cuss
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