

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260966
Address:	Billingbear Lodge, Maidenhead Road, Binfield, Wokingham, RG40 5RU.		
Proposal:	Householder application for the proposed erection of extensions and alterations to the dwelling with single storey rear extension to form annex, alterations to the roof form, and associated changes to fenestration, following the demolition and removal of the existing rear projection and associated structures.		
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 Technical Note Preliminary Roost Assessment (AAE, July 2025), Bat Emergence Survey (4 Acre Ecology, 24 November 2025) Arboricultural Impact Assessment/Statements and Tree Protection Plan (Gifford Tree Service, 3 December 2025) and reviewed the plans and elevations submitted in support of the application.

The AAE PRA internal inspection recorded scattered Brown long-eared type droppings in the roof space of the single-storey extension. An active wasp nest restricted full access. An accumulation of mixed-age brown long-eared type droppings were recorded in the main attic space. The attic space in the main building, according to AAE appeared to have been recently relined and insulated with mineral wool.

A peak count of nine bats were observed emerged from the main building during the third emergence survey on 7 August 2025. Common Pipistrelle and Brown long-eared roost were confirmed in main house northern gable, the eaves on the northern side, the southern gable end, and the apex of the roof to the east of the chimney. 4 Acre concluded that there was a moderate, low and high levels of bat activity during

the respective emergence surveys. During the 28 August 722 registrations were recorded by five surveyors equating to 1.60 per minute per surveyor.

4 Acre's Ecologist concluded that there are at two Common pipistrelle and Brown long-eared bat roosts in the main house and no roosts in the outbuilding surveyed. I agree that to carry out the proposed work legally the Owner requires a European protected species licence to be issued by Natural England.

The PEA stated that *"none of the surrounding established trees/vegetation will be removed to facilitate the works and, therefore, any flight-lines currently utilised by bats will be retained"*. 4 Acre Ecology describe that *"large woodland strips along the roads and between the fields in a matrix of the area, particularly Beech Wood to the west provides rich and diverse habitats suitable for a wide range of bat species and they are connected to the site by ecological corridors. There are potential roost sites within other buildings in the area and in trees the adjacent woodland"*. 4 Acre Ecology do not state that the trees on site have been inspected to rule out presence of potential bat roosting features.

There is no evidence that either Ecological Consultant has therefore completed a bat roost inspection of the Douglas Fir or the Acacia trees proposed to be felled. Impacts of removal of the hedgerow around T4 on breeding birds and bats foraging and commuting to and from the confirmed roosts. The application must not be approved until the ecologist has assessed the impact of the additional hedgerow removal, the impact of not retaining T4 and inspected all the Acacias trees (described as poor structural and physiological condition). Acacia is prone to splits and cracks, making it particularly suitable to provide bat roost habitat.

Subject to the results of the tree roost assessment surveys if application 260966 is subsequently approved, submission of a copy of confirmation from Natural England that Bat Low Impact Class Licence WML-CL21 Licence Return 13108A must be secured by condition to demonstrate that the licence deadline has been extended and changes to the proposals and planning permission reference have been approved by Natural England.



Development Proposals & Site Layout

P25/18/S/201 RevB will result in the increase impact on wildlife including foraging and commuting bats and breeding birds and invertebrates by causing removal of Douglas Fir tree T4,

The WBC Highways consultee and parking standards policy and do not require additional car parking spaces for the addition of one bedroom and the plans Site Layout and Roof Plan approved under 253011 demonstrate that there is sufficient existing hard surfacing to accommodate adequate number of cars for a 4-bed home. There are no proposals or existing permission for commercial use in the house.

The Site Layout P25/18/S/201 RevA fails to show that an increase in car parking would be offset by better protection permanent of the Root Protection Area of category A Atlas cedar T1, e.g. by installing a low fence and remediation of compaction following completion of the development works.

I therefore request that the layout in respect of creation of an additional car park is revised in order to secure no net biodiversity habitat loss and maintain foraging and commuting habitat for bats.



Arboricultural Impact Assessment

According to BS5837:2012 the Arboricultural Impact Assessment and Tree Protection Plan should include all existing hedgerows and features such as tree stumps, relevant landscape features and artefacts, boundary features and means of enclosure. However, the submitted TPP fail to show any of the hedgerows shown on the Site Plan and the PRA also does not include a habitat plan. I request that the tree survey is amended to include the eastern hedgerow and the hedge around T4 which was previously approved to be retained.



The AIA does not include detail to justify categorizing T4 as category U. Contrary to

the Category U definition in BS5837:2012 the 16m-high mature tree is not dead, diseased, of very low quality or described as in decline. The Tree Survey Schedule states that T4's Physiological Condition and Structural Condition are Normal. It is unclear why the Arboriculturalist has estimated T4's life expectancy as not applicable.

Provided that the gates proposed will not be lit and the Acacia trees can be retained, I have no objection to the installation of a gate on the western access. However as approved in 253011, the western access should not be used as the construction access.

To retain a commuting and foraging corridor for bats and wildlife and secure no net loss of biodiversity I advise that the Arboricultural Impact Assessment, Tree Protection Plan and Site Layout P25/18/S/201 RevB are amended to remove the new car park proposed on the south of the western gate, retain and protect throughout construction all hedges and trees, and to permanently protect the Root Protection Area of the very mature Veteran T1. If an amended tree survey and removal schedule (consistent with a revised Site Layout and Roof Plan RevC) are approved, WBC condition CL8 should secure submission and approval of a detailed BS5837:2012 Arboricultural Method Statement protecting the RPA of T1 and T2 and all retained hedgerows and trees during site set-up and construction.

Conditions & Reasons (if required)

Awaiting revised bat survey including tree potential roost assessment, revised site layout, landscaping, Arboricultural Impact Assessment, AMS and Tree Protection Plan.

Date:	04/06/26	Signed:	T Cuss
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