

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	253011
Address:	Billingbear Lodge, Maidenhead Road, Binfield, Wokingham, RG40 5RU.		
Proposal:	Householder application for the proposed erection of extensions and alterations to the dwelling, including changes to the ground floor and first floor layout, alterations to the roof form, and associated changes to fenestration, following the demolition and removal of the existing rear projection and associated structures as shown on the approved plans.		
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) and Bat Emergence Survey (4 Acre Ecology, 24 November 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.

According to the Ecologist none of the established trees/vegetation will be removed to facilitate the works, therefore all bat flight-lines will be retained.

The attic space in the main building, according to AAE appeared to have been recently relined and insulated with mineral wool. The single-storey extension is lined with a bitumen based membrane and is insulated.

AAE advise that lighting can adversely affect invertebrates, birds and bats but has assessed that "there should be no change in current light levels from the proposed works".

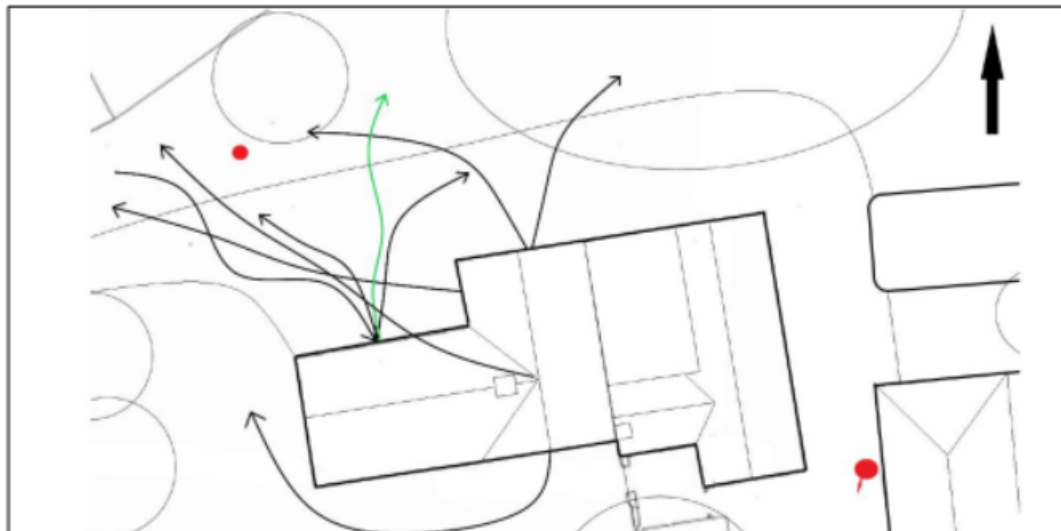
A peak count of three Common pipistrelle emerged on 17 July 2025. One emerging from main house northern gable, one from the southern gable end, and a third from the apex of the roof to the east of the chimney.

Nine bats emerged from the main building during the survey of 7 August 2025. One Common Pipistrelle at from the apex of the building and flying north. Two Brown long-eared emerged from the eaves on the northern side and five Common pipistrelle emerged from the northern gable. One Brown Log-eared emerged from the eaves on the northern side of the main house.

During the 28 August survey Common pipistrelle emerged from northern gable, and one from western eaves of the northern gable. Common pipistrelle re-entered in the northern eaves at 20.22 and 20.23 and re-emerged seconds later.

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.

Figure 1: Emergence Summary



I am satisfied that the survey effort and methodology are adequate for 4 Acre's Ecologist to conclude that there are at 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 Brown long-eared bat roost in the single storey extension is proposed to be retained unaffected by the works proposed. It is unclear if the Ecologist recommends that the obstruction to the roost in the main house be removed and gaps reopened. AAE recommended a range of mitigation measures could be implemented to ensure maintenance bat roosting opportunities in the long-term. Any new timbers will only be treated with 'bat friendly' chemicals and any new roof lining will use a traditional bitumen-based felt (Type 1F) or an approved breathable membrane, which has passed a 'snag test' and has an appropriate certificate. Replacement/new access points could be provided in a similar location as currently being utilised by bats, with a corresponding gap provided within the roof lining to allow bats back into the attic space.

4 Acre Ecology fail to refer to up-to-date CIEEM UK Bat Mitigation Guidelines or WBC Local Plan policy and the NPPF. I must therefore disagree with paragraph 6.9 that “*No mitigation is required by the guidelines*”. I support including compensation measures in the EPSL mitigation strategy to be agreed with Natural England. Installation of integrated bat tubes or boxes and bat access tiles or slates to mitigate and compensate for three roosts and other potential roost features lost is best practice, the most current guidance should be used and the requirement of WBC policies CP3, CP7 and MDD TB23 and the NPPF 2024.

4 Acre Ecology do not reference ILP/BCT [Bats and Artificial Lighting at Night Guidance Note GN 08 / 23](#), but I welcome the lighting proposals in recommendations in section 7. Security lighting of 75W is unnecessary and lighting levels should be kept to minimum levels of health and safety in line with GN08/23 and secure by design and paragraph 198 of NPPF 2024. The Technical Note PRA directly contradicts Bat Emergence Survey paragraph 7.14 and confirmation is needed that no trees and shrubs will be removed. I support the mitigation enhancement proposals in paragraph 7.15 and 7.16.

Summary

Provided that a copy of the Protected Species Mitigation Licence and mitigation strategy approved by Natural England are submitted prior to commencement in accordance with BS42020 section 9.3 there are no objections to the development as proposed.

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 approved mitigation strategy have been submitted to the council.

Thereafter mitigations measures detailed in the licence shall be maintained in accordance with the approved details.

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

Date:	4/2/26	Signed:	T Cuss
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