
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252334 & 252335
Address:	Bird Place, Henley Bridge, Henley On Thames, Wokingham, RG9 2LN.		
Proposal:	Householder application for the proposed erection of single storey rear extension with basement following demolition of existing rear lean-to extension, rear roof terrace, lowering of basement floor and changes to fenestration. Application for Listed Building Consent for the proposed erection of single storey rear extension with basement following demolition of existing rear lean-to extension, rear roof terrace, lowering of basement floor and changes to fenestration.		
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 Bat Emergence Surveys (Morph Ecological Consultants, Ref 2023-1, 3 September 2025), Extended Phase 1 Ecological Assessment (Phillips Ecology, June 2025), revised Arboricultural Report (Sylva Consultancy, Ref 251562025, September 2025), Design and Access Statement (Shack, September 2025) and revised Heritage Statement (Smith Jenkins Planning & Heritage, Ref 4686m September 2025). I have also reviewed the covering letter, and the plans and elevations submitted in support of the application, local planning history and bat roost and activity records including for Stone Bridge and Thames Bridge House.

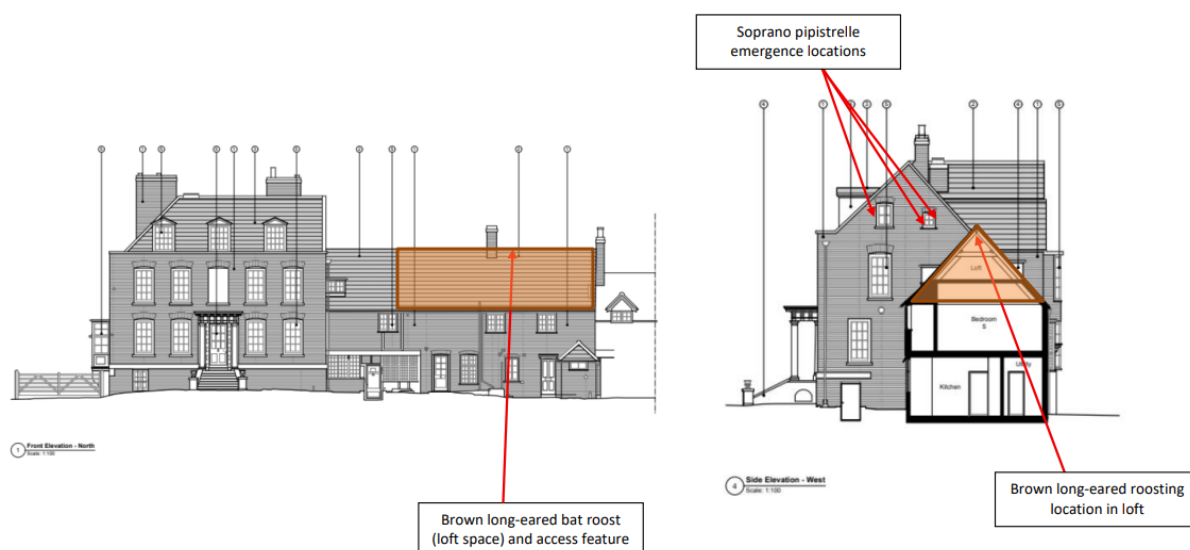
All bat species are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as amended. Under this legislation it is an offence to deliberately or recklessly to destroy or damage their roosts, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from Natural England in England. A bat

roost is interpreted as “any structure or place used for shelter or protection” whether or not bats are present at the time.

According to the Ecological Assessment the buildings have a large number of crevice features including lifted tiles and cracks. In addition, Long-eared bat droppings were recorded scattered in the roof void of Rose Cottage.

The submitted Bat Emergence Surveys confirmed the presence of five bat roosts within Bird Place and Rose Cottage, comprising four occasional day roosts of soprano pipistrelle and one day roost of brown long-eared bat. There was high bat activity on-site, with bats (mostly to the front of the property and along the tree line to the east of the property) and commuting via the site. The Ecologist states that “*the garden provides optimal foraging and commuting habitat due to the vegetation and lack of night-time lighting. It could therefore be considered that the garden forms a reasonably important site for foraging and commuting bats*”.

Figure 3: Bat Emergence Locations



The Ecologist concluded that the roosts are not higher conservation value roosts such as a maternity roost. However, they have made no reference to the Review of the Status of Bats in Berkshire 2020 (CA Ecology), and no hibernation survey have been undertaken to date to rule out hibernating bats. I am not satisfied that data or information has been submitted to conclude that the building is unlikely to support a hibernation roost. In the absence of further characterization and survey data, it is unclear whether how they conclude that the roof voids and crevice roosting features present are unlikely to provide habitat for hibernating bats. I recommend hibernation surveys are undertaken and that a precautionary approach should be adopted unless the presence of hibernating bats can be ruled out. Given the number of local bat survey records and the importance and proximity to the River Thames, I'm very concerned the desk-based assessment failed to include a data search of either the local bat group or Environmental Record Centre. Nor has either consultancy assessed local planning history and the bat roost and activity records on the site, Thames Bridge House or the River Thames in order to inform bat activity or roost characterization surveys.

The Ecologist has confirmed that works will proceed only under a European Protected Species (EPS) licence with supervision by a Bat Earned Recognition

Registered Consultant. The proposed mitigation measures include:

- Pre-works checks and toolbox talks for contractors.
- Supervised hand-removal of tiles and mortar features.
- Provision of five new bat roosting opportunities (bat boxes and access tiles).
- Retention or recreation of loft access features for brown long-eared bats.
- And use of Type 1F bitumen felt in re-roofing to avoid entanglement risk.

One potential blackbird nest was noted and the buildings offered further nesting opportunities. Compensation proposed includes installation of two swift, one hole nest bird boxes or bricks, in appropriate shaded locations.

I understand from the application that no works are currently proposed to boathouse. Further ecological surveys, assessment and mitigation strategies would be necessary to determine the impact on any works to the boathouse. If any works are proposed, they must be included in any future applications to the LPA.

Summary

Subject to hibernation surveys, pre-works checks and consideration of local bat roost and activity data I consider that it is not unlikely Natural England would grant a European Species Licence. While I am not in agreement that the assessment in Bat Emergence Survey and Extended Phase 1 demonstrate low conservation value of the roosts, provided at a copy of the EPSL (or proof of site registration) and the mitigation strategy approved by NE are submitted prior to commencement biodiversity-sensitive lighting, landscaping and the mitigation and enhancements for birds set out in Bat Emergence Surveys Section 4.2 are secured by condition and implemented, then there are no ecological 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 and approved mitigation strategy (or an email from Natural England that the site has been registered under a Bat Earned Recognition Class Licence) have been submitted to the council.

Reason: To ensure that bats, a protected and priority species (as per the NPPF), are not adversely affected by the proposals. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: Prior to commencement 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 birds 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 of their territory, 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 biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 198 Section 15 Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Date:	31/12/25	Signed:	T Cuss
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