



Appeal Decision

Site visit made on 27 May 2026

by A James BSc MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 24 July 2026

Appeal Ref: 6008194

44 Proctors Road, Wokingham RG40 1RP

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mr Gordon Davies against the decision of Wokingham Borough Council.
 - The application Ref is 252634.
 - The development proposed is for a two-storey extension to front, side over existing attached garage and rear of existing property with attached single storey sunroom to rear. New windows, doors and rooflights as indicated on attached plans.
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Decision

1. The appeal is dismissed.

Main Issue

2. The effect of the proposal on protected species, specifically bats.

Reasons

3. The appeal site comprises a two-storey dwelling which is set back from Proctors Road with parking and a landscaped front garden. The proposed works involve a two-storey extension to the front and side of the property, with a rear extension incorporating a single-storey sunroom. The works will include installation of new windows, doors and rooflights.
4. Bats are designated and protected under the Conservation of Habitats and Species Regulations 2017. Current advice states that it is essential that the presence or otherwise of protected species, and the extent that they may be affected by development, is established before planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision.
5. Standing advice from Natural England indicates that the Council should request a survey where a development proposal is likely to negatively affect bats or their roosting, foraging, or commuting habitats. The Council has indicated that the site lies within an area suitable for bat roosts, and the appellant has also noted that the planning constraints map identifies the appeal site as being within an area of potential bat activity. Although limited there are some distribution and historical records to suggest bats may be present in the local area. Given this context, it was both proportionate and reasonable for the Council to request a Preliminary Roost Assessment (PRA).
6. The appellant's PRA has documented the ecological value of the site and notes that the quality of roosting habitat within the appeal site is categorised as

‘moderate’ as there are a range of features that could be used by roosting bats. The assessment also documents that although no evidence of roosting bats were recorded during the survey, features were present which were suitable for roosting bats. These features include crevices in the external cladding and soffits, access into cavity walls, tears and gaps in the sarking felt, and internal voids. The proposed development would lead to a loss or alteration of these features and further emergence surveys were recommended to establish presence or likely absence of bats.

7. The PRA was undertaken by a qualified ecologist, who was familiar with industry guidance. They undertook the PRA using a methodology set out by the Bat Surveys for Professional Ecologists: Good Practice Guidelines, 4th Edition (the BSPE), which is an agreed and widely accepted industry standard. There is no compelling evidence to suggest that the survey was undertaken in an improper manner. In this context, the conclusion of this survey attracts substantial weight as a material consideration in this decision.
8. Emergence watches and a re-entry watch were subsequently undertaken by the appellant. However, the dates and timings for the emergence watches are not consistent throughout the evidence. As such, this creates ambiguity as to whether the emergence watches had been undertaken during the optimal period. Additionally, it would appear that the watches were not undertaken at least three weeks apart as recommended by the PRA and the Council ecologist, and as per the guidance set out in the BSPE.
9. Even if I were to accept that the emergence watches had been undertaken within the optimal period and three weeks apart, the Council ecologist has noted that the appellant had no night vision aids or bat detectors when undertaking the watches. In these circumstances, the appellant has not demonstrated that the emergence watches and re-entry watch have been undertaken in line with the industry recognised methodology set out in BSPE. Thus, the conclusions drawn from the appellants emergence watches attract limited weight as a material consideration in this decision.
10. While the appellant has indicated that a proportionate approach has not been taken with regards to requesting surveys, as the proposal would be considered relatively minor in scale, the PRA indicates that the appeal building supports a range of features that could be used by roosting bats. The proposed development would lead to a loss or alteration of these features and would have a potential negative impact on bats. It is important to establish the presence or absence of bats in order to understand the degree of impact on this protected species. Consequently, the request for further surveys is necessary and proportional in this case in order to accurately establish an ecological baseline. Without such information, I cannot conclude with any degree of confidence that the proposal would not result in harm to the protected species or its habitats.
11. Reference has been made to neighbouring roof works carried out under permitted development rights where surveys were not required. The presence of other developments in the local area, and the site's location within an urban setting, do not in themselves provide sufficient justification for foregoing further survey work on this specific site. Likewise, although it is suggested that a PRA would not have been required if parts of the roof profile were unchanged, the proposal before me includes roof alterations. As I have already found the survey requirements to be

necessary and proportionate, any alternative proposal would need to be assessed on its own merits. I also do not have the full details of those cases before me, and I have determined this appeal on its own merits based on the evidence before me.

12. Moreover, as bats are European Protected Species (EPS) and it is an offence to damage or destroy their breeding or resting places, developers must be satisfied that works would not affect bats. Surveys may therefore still be required even where works are undertaken under permitted development rights.
13. The appellant has raised concerns about the cost of further surveys. Nevertheless, I have found them to be necessary and justified, and there is no compelling evidence that undertaking the further surveys would impose an unreasonable financial burden on the appellant.
14. Consequently, I conclude that it has not been shown with any certainty that the proposal would not cause unacceptable harm to protected species, specifically bats. Therefore, the proposed development would conflict with the provisions set out in Policies CP3 and CP7 of the Wokingham Core Strategy Development Plan (2010) and Policy TB23 of the Managing Development Delivery Local Plan (2014). These policies seek to conserve and enhance the ability of the site to support fauna and flora including EPS and resist inappropriate development which harms EPS.

Other Matters

15. I acknowledge the appellants frustrations with regards to the Council's handling of the planning application. In particular, concerns that the Council did not negotiate positively and proactively with them in the application process. Nevertheless, I have considered the proposed development on its planning merits.

Conclusion

16. The proposal conflicts with the development plan as a whole and material considerations do not indicate that the appeal should be decided other than in accordance with it. Accordingly, the appeal should be dismissed.

A James

INSPECTOR