

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251022
Address:	Castlemans Cottage, Bath Road, Hare Hatch, Wokingham, RG10 9UT.		
Proposal:	Application for Listed Building consent for the proposed repair works to the main roof. (part-retrospective)		
Type of Development:	Other Listed Building alteration or extension		
Site Visit Made:	No		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☒ **Negotiate amendments 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 Roost Assessment (Nature Bureau, Ref Eco25-19 Rev 002, 4 May 2025), HCUK Ecologist's email (22 April 2025), the Proposed Strategy to Support and Encourage Bats (April 2025) and Castlemans Cottage Roof Repairs (BCS Ref25/0784/OTHBN). I have also reviewed the Heritage Statement and Design and Access Statement and Structural Appraisal (Mason Navarro Pledge, Ref 225131-RP- S – 0001, April 2025), plans and elevations submitted in support of the application.

All species of bats are protected under UK law, including the strict species protection provisions as implemented by The Conservation of Habitats and Species Regulations 2019 (as amended), and The Wildlife and Countryside Act 1981 (as amended). Regulation 43 of the Conservation of Habitats and Species Regulations 2017 (as amended by the 2019 Regulations) makes it illegal to:

- i. Deliberately capture, injure or kill a bat;
- ii. Deliberately disturb bats in a way that would significantly affect their local distribution or abundance, or affect their ability to survive, breed or rear young; or
- iii. Damage or destroy a roost – regardless of whether the action was deliberate or not.

Furthermore, The WVA 1981 (as amended) makes it an offence to intentionally or recklessly disturb bats whilst they are occupying a structure or place which is used

for shelter or protection, or to damage, destroy or obstruct access to this structure or place.

Preliminary Roost Assessment

The data search and desk study completed by the Ecologist identified records of a bat roost in Little Castlemans 16m from the application site. It was concluded that Little Castleman hosted an occasional day roost for an individual Soprano pipistrelle bat. There are a number of roost records and European Protected Species Licences for destruction of roosts in the vicinity which I am satisfied the Ecologist has taken into account in their assessment of the likelihood of B1 supporting roosting bats.

Inspections were undertaken by the Ecologist on 16 April 2025. All parts of the roof had previously been stripped of tiles, and the timber frames are exposed. Only the chimney remains in-situ, along the ridge of the southernmost roof pitch. The insulation within the roof void had been significantly disturbed because of the roofing works. During the inspection, several small fragments were recovered, which were suspected to be remnants of bat droppings. I am concerned that there is an error in the DNA analysis of the droppings, and the record of Pygmy shrew is incorrect. I am not satisfied that the inspections rule out the presence of bat roost prior to stripping of the roof and insulation.

According to the Ecologist building B2 remains intact with some areas showing gaps where roof tiles have lifted. Additional gaps were also noted beneath the lead flashing near the roof ridge. While I agree B1 currently offers no suitable bat roost features the PRA does not rule out impact to bats and roost in B2. I support the conclusion that all works must proceed under a Method Statement designed to minimise potential disturbance through control of noise, dust, fumes, lighting, and vibration. I agree that this statement must also include provision for enhancing roosting opportunities for both crevice- and void-dwelling bat species. As proposed by the Ecologist B1 should be treated 1 as a lost roost for both void and crevice dwelling bat species.

Figure 3: Exposed roof beams and remaining chimney



I agree with the Ecologist's recommendations that:

- Preliminary Roost Assessment of the neighbouring loft should be inspected.
- Provision of a detailed bat Method Statement
- Mitigation strategy that must include provision of bat access ridge tiles.
- Further emergence roost characterization surveys.

However, the applicant's proposal to install breathable membranes which can cause death and injury to bats, must be resolved before the listed building application is approved.

I am concerned that the Ecologist has not assessed the Castlemans Cottage Roof Repairs Dwg 25/0784/OTHBN or Proposed Strategy to Support and Encourage Bats. Nor has reference has been made to the Structural Appraisal report and Heritage Statement and DAS. It appears that the Proposed Strategy to Support and Encourage Bats was prepared by the applicants prior to completion of the Preliminary Roost Assessment and drawing 25/0784/OTHBN proposes that breathable felt will be used in large parts of the outside sides roof more accessible to bats. According to the application form works started on 17 March 2025 before an ecologist made any assessment or made any mitigation recommendations. The application form also proposes the use of breathable felt (Tyvek or Permavent) which is not in accordance with proposals in the PRA.

In order to maintain the favourable conservation status of bats on the site and comply with the NPPF and Local Plan policies CP3 and CP7 implementation of all the measures proposed in PRA section 4.2.2 - 4.25 and 4.3 must be secured by planning condition.

Proposed Strategy to Support & Encourage Bats / Roof Repairs Proposed Features

In no circumstances should the use of Tyvek or Permavent membrane be approved. I request that drawing 25/0784/OTHBN is refused.

While I support the proposals in Proposed Strategy to Support and Encourage Bats paragraph 2.6.4 that any timber used will only be treated in accordance with Natural England approved [‘Timber-treatment products suitable for use in or near bat roosts’](#) I object to the proposals in 2.6.3. Insufficient details are provided in paragraph 2.6.1 and 2.6.2 for the LPA to secure a detailed bat mitigation strategy and necessary mitigation to compensate for the roost features which have been destroyed and ensure enhancements for bats. In the absence of detailed consistent proposals, the applicant has not demonstrated “*appropriate mitigation and/or compensation measures will be incorporated into the proposed works and put in place*” as stated in 3.1.3. I cannot confirm if a European protected species licence would be required in the absence of further survey information from the neighbouring property.

Heritage Statement and Design and Access Statement

While the Heritage Statement and Design and Access Statement states that some deteriorated historic fabric is beyond salvage the applicant has sought to retain as much of the historic roof structure as possible. It does not appear that the front and rear elevations will remain undisturbed as proposed. Again, I object to the HSDAS section 2.1.2 proposal for a breathable membrane which does not prevent snagging

of bats use of different membranes on different 'flanks'. No details of the proposed landscaping within the grounds are currently submitted.

Summary

To avoid disturbance of any bats or roosts in the neighbouring buildings, the proposals and mitigation strategy must be amended to ensure that the works are completed prior to hibernation and after the breeding season and not as recommended in section 4.2. Alternatively, the results of the emergence surveys and neighbours roost assessment must be provided to the LPA to rule out direct and indirect impacts to bats and secure additional mitigation measures. I request that a closing out report is submitted within one month of substantial completion of the roofing works.

Conditions & Reasons (if required)

Awaiting further bat survey results and detailed bat mitigation strategy and landscaping proposals.

Condition: Demolition and works affecting the roof and loft shall only be undertaken under the supervision of an appropriately qualified ecologist and Natural England Bat licence holder with experience of supervising demolitions where there is a risk of bats being present. Works are to be to follow a method statement that must include the measures provide in Preliminary Roost Assessment (Nature Bureau, Ref Eco25-19 Rev 002, 404/05/2025) sections 4.2.2 to 4.2.5 and prior to recommencement of works have been agreed in writing between the ecologist and the contractor. The Method Statement must detail all techniques, including the careful removal of tiles by hand, and the procedure to follow should bats or signs of bats be found and details of construction and timbers and membranes which will be used. A closing-out report including details of the methods used, and any bats or signs of bats found, is to be issued to the council within one month of substantial completion.

Where the survey results indicate that development will result in ecological impacts not previously addressed the Method Statement will be revised and new or amended measures, and a timetable for their implementation, will be submitted to and approved in writing by the local planning authority prior to the re-commencement of development. Works will then be carried out in accordance with the proposed new approved ecological measures and timetable.

Reason: There is evidence that bats have roosted in the building in the past and they may roost in the building in the future. This condition will avoid and mitigate negative impacts to protected species. Relevant policy: Local Plan Core Strategy policies CP1, CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Prior to re-commencement full details of the bat roost compensation and enhancement measures outlined in Preliminary Roost Assessment (Nature Bureau, Ref Eco25-19 Rev 002, 404/05/2025) section 4.2.2 shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed and maintained as approved.

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

Date:	23/06/25	Signed:	T Cuss
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