

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260293
Address:	37 Rose Street, Wokingham RG40 1XS.		
Proposal:	Application for Listed Building consent for the proposed replacement windows on the rear elevation, insertion of wood burner and associated flue liner, installation of insulation to roof and reconfiguration of modern extension along with changes to fenestration.		
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**
- ☐ Request further information before determination as **stated below**
- ☐ Objection due to the reason(s) **stated below**

Comments On Proposal

I have reviewed the Heritage Design and Access Statement (Walsingham Planning, February 2026) and the submitted drawings, plans and elevations. I have also reviewed local planning history and protected species records.

All species of bats in the UK are protected under the Wildlife and Countryside Act (1981) as amended and the Conservation of Habitats and Species Regulations, 2017 (as amended). Under this legislation it is a strict liability offence to deliberately or recklessly capture, kill, disturb or injure or destroy a bat or to disturb damage or destroy the resting place, or obstruct access without having first obtained the relevant derogation licence from Natural England. Wild birds are granted legal protection under the WCA 1981 (as amended). This legislation protects the birds, their eggs and nests whilst being built or in use. The granting of Listed Building or planning permission does not provide derogation for a protected species offence or a legal defence for not obtaining a licence.

No protected species survey has been provided to rule out or confirm the presence of bats or bird nests. Rose Street is identified by the Thames Valley Environmental Records Centre as a hot spot for Swifts. Surveys of similar properties to 37 Rose Street are provide suitable roosting habitat for bats and I am aware that 38 37 Rose Street was identified has having bat roost potential. The 2024 NPPF paragraph

187, states that planning decisions should contribute to and enhance the natural and local environment by “d) minimising impacts on and providing net gains for biodiversity..... and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs”. I therefore request that precautionary mitigation measures for bats and nesting birds are be secured by planning condition, and the need to provide compensation and enhancement for Swifts and bats in line with MDD TB23.

Polypropylene filaments used in the manufacture of modern breathable underlays are known to entangle and kill bats and must not be used. Only traditional Bitumen Type 1F (with a hessian Matrix) roofing felt or a breathable membrane which been certified by Natural England snagging propensity installed in insulation of the property. (see [Non-Bitumen Coated Roofing Membranes - Buildings, planning and development - Bat Conservation Trust](#))

Conditions & Reasons (if required)

Condition: No works to buildings or structures that may be used by breeding birds shall take place between 15 February and 15 September inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds’ nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

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.

Condition: Only traditional Bitumen Type 1F (with a hessian Matrix) roofing felt or a breathable membrane which been certified by Natural England snagging propensity installed may be in insulation of the property. Where it is necessary to use wood timber treatments, only treatments on the approved list of [‘Bat roost and Timber products](#) must be used.

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.

Bats are mobile creatures, and it is possible that protected species may be encountered once works commence. I request the following informative:

Informative: Bats are a protected species under the Conservation of Habitats and Species Regulations 2017 (as amended). This permission does not convey or imply any approval or consent for protected species required under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 (as amended) or provide a legal defence for not obtaining a licence.

Should any bats, evidence of bats or birds be found prior to or during the development, all works must stop immediately, and an Ecologist is contacted for further advice before and works can proceed. All contractors working on site should be made aware of the advice and provided with the contact details of an appropriately licensed ecologist regarding any protected species that may be found on the site.

Date:	12/04/26	Signed:	T Cuss
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