

Planning Application Nr 252634

Response to Planning Dept email 4th December 2025

Further to the email of 4th December, and with reference to the Council's ecologist's comments -

Emergence watches were carried out and reported on between 18th and 21st June 2025 and NOT as stated.

Although not now deemed necessary, a re-entry watch was completed on 21st June. This is clearly stated in the copy email that was sent.

Not a single bat was observed in the vicinity let alone emerging or re-emerging from the property on any of the watches described or during subsequent ones which were undertaken. .

Observation points were clearly described in the email.

It is widely documented that bats are creatures of habit, returning to roost in the same place. Occasionally, it has to be admitted, a bat might find a new location but these actions are minimal in light of the general behavioural observations.

One doesn't need sophisticated equipment to see bats emerging from or re-entering from a house or even flying about when you are in close proximity. You do need such aids to be able to identify which species they are. However, this is incidental to the overriding issue of whether there would be any disturbance to roosting bats. As no bats were seen it can be safely taken that there would be no disturbance during the extension works to non-existent roosting bats.

With regard to the submitted PRA, it's author confirmed that there was absolutely no evidence of any bat activity in and around the property or there ever having been any, she did however, grade the property as having moderate potential to be used for roosting due to the storm damage which hadn't been reinstated. I stress Potential. No bats were observed around the property in the weeks and months following the PRA inspection on 17th June and so to advise that further emergence surveys will be necessary, at great delay and expense for no good reason other than to follow a misplaced protocol and tick a box is quite frankly laughable and doesn't show ecologists in a very good light and defies commonsense.

Whilst the ecologist made reference to the possibility of bats gaining access for a roost due to the unrepaired damage to the fascia and soffit boarding she did actually inspect same and saw that all openings were closed off with wire netting and mesh, prompted not by the possibility of any bat incursion but unrelenting feral pigeons trying the same.

It is noted that the 'Bat Survey Guidelines' do not draw any distinction between major housing developments and small householder projects, applying the same rules to both.

Para 4.3.7 states that survey work should be 'appropriate and proportionate' and not to carry out surveys that are not needed.

Natural England Policy 4 states '- it may accept lower than standard survey effort where costs and delays associated with further surveys would be disproportionate to the additional certainty that would bring'.

Also, there would seem to be a case of double standards here. As confirmed by your colleague in the planning department, the government Planning Portal Note on Planning permission for roof works states – Work to the roof of a house, eg re-roofing that does not materially affect it's external appearance, will not usually require planning permission.

There have been three houses in Proctors Road in the last year, all in 'the zone', that have had their roofs completely stripped and been re-roofed with absolutely no regard for the possibility of disturbing any roosting bats during or before commencing the work. And, definitely no planning application. So it's only a change in appearance/form that warrants a conversation about bats, anything else doesn't matter and it's hard luck on any bats that might have been disturbed.

Proctors Road is highlighted on your 'Planning Constraints Map' as being in an area suitable for a bat roost... The Council is using this as their criteria for requiring a bat survey to accompany a planning application for any project that might entail some roof work in order to comply with BNG rules, however, whilst it is alleged that this map is regularly updated, and it would seem to have been updated to show recent housing developments, the shaded area outlining the 'bat corridor' has not been amended to reflect the reduction in habitat and foraging sites. These housing and infrastructure developments have caused the trees and hedgerows which previously sustained the bat population to be decimated and hence the dramatic reduction in the bat population in this area in the last few years.

Berkshire and South Bucks Bat Group (BSBBG) Records Officer reports only 12 records of roosting bats in the vicinity in the last 10 years and of these only one was in nearby in London Road. Nothing recorded for Proctors Road.

Thames Valley Environmental Records Centre (TVERC) may have more detailed records but I am assured that this information is shared with BSBBG who commented 'the truth is that complete data about bat populations does not exist' so, in effect, the Council is relying on outdated and inadequate information to impose rigorous and costly checks

on planning applicants for no good reason other than a suspicion that there might be bats in the area with no reliable data to back that supposition up.

The Bat Conservation Trust, Bat Survey Guidelines state that 'if a presence is not established during a PRA, no further surveys are required. Contractors should be alerted to the possibility of bats turning up unexpectedly'.

The Bat Conservation Trust, 'Bats and the Law' states 'if a bat survey demonstrates that bats and/or a known roost are likely to be affected by the proposed development and planning permission is to be granted, a condition should be placed on the decision notice requiring the developer to apply for and obtain a European Protected Species Licence before work commences'

Natural England's recommendations for planners goes on to say 'You should explain to a developer that they may not need to provide a detailed survey if they are able to show that protected are unlikely to be affected, even if they are on or near a development site.

If large developers can be afforded these considerations, why not householders? Large commercial developers seem to hold far more sway than single householders where the situation seems to be cut and dried with no grey areas.

The law also states that 'where planners have good reason to think that a development may impact on bats...' What good reason do the council have ?

The applicant, as project manager for the refurbishment, is fully aware of the legal responsibilities towards bats, their habitats and roosts, whether occupied or not and will have no hesitation in consulting the relevant authorities in the unlikely event that bats are subsequently encountered during the works, given the observations made over the last five years.

Finally, I would draw your attention to the announcement made by HMG in parliament on Tuesday 16th December regarding the wholesale changes to BNG rules which will exempt small developments under 2000m².

I would therefore request that you reconsider your findings as outlined in your email and grant permission to proceed even if it is with added caveats.

Gordon Davies MCIOB