

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) and applicant's email of 7 July 2025. 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 identified records of a day roost for an individual Soprano pipistrelle bat in Little Castlemans 16m from the application site hosted. 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. The roof had previously been stripped of tiles, and the timber frames are exposed. Only the chimney remains in-situ.

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. I agree B1 currently offers no suitable bat roost features. The PRA does not rule out impact to bats and roost in B2. I therefore 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 as a lost roost for both void and crevice dwelling bat species.

I agree with the Ecologist's recommendations that the following are required to maintain the conservation status of bats in the locality and avoid illegal disturbance:

- 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.

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 been made to the Structural Appraisal report and Heritage Statement and DAS. According to the email of 7 July 2025 the Owner the Proposed Strategy to Support and Encourage Bats and drawing 25/0784/OTHBN were prepared by the prior to completion of the Preliminary Roost Assessment and superseded by it. The proposal to install breathable felt in large parts of the outside sides roof that are accessible to bats is therefore unacceptable. Proposed Strategy to Support and Encourage Bats and drawing 25/0784/OTHBN must not be approved. The application form proposes the use of breathable felt (Tyvek or Permavent) which is also not in accordance with proposals in the PRA. I am happy to remove my previous objection if the Owner's email proposal of 7 July that only bitumen Type 1F roofing felt will be used is secured by condition.

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.

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 must object to the proposals in 2.6.3 to use breathable membranes. 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. A detailed Method Statement must be agreed between the Ecologist and the Contractor prior to re-commencement of works on site.

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. 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’.

Can the applicant clarify what works are proposed in the garden or to modify lighting? Paragraph 5.4 states that *“additional enhancements will maximise presence of mature trees within the grounds”* but no landscaping scheme has been submitted for approval. I must strongly object to any external lighting changes are proposed.

Summary

Results of any internal inspection of roofspace at Pandora on the northwest of Castlemans Cottage have not been provided to the LPA. The LPA does not support carrying out works in July 2025 unless the results of the neighbour’s roost assessment demonstrate that direct or indirect impacts to bats have been ruled out by the licensed ecologist and precautionary approach must be adopted. In line with the Ecologist’s email of 22 April 2025 the Owner and their Contractor, as well as the LPA, must assume that there is a potential to disturb bats in the neighbouring property. To avoid disturbance of any bats or roosts in the neighbouring buildings, timing of the works, the mitigation proposals and detail method statement must be agreed by the owner, contractor and the Ecologist.

In order to recommend approval and avoid a requirement for pre-commencement conditions, amended bat access mitigation measure as outlined in the PRA section 4.2.2 need to be submitted prior to determination. The access mitigation measure proposals agreed by the Contractor must be consistent with all other proposals drawing approved by the LPA, best practice provided by CIEEM UK Bat Mitigation Guidelines and include:

- Confirmation use of only Type 1F bitumen.

- The detail of proposed treatments for timber which must be on the approved list of 'Bat roost and Timber products (TIN 092)13'.
- Drawings showing the agreed design, location and number of the ridge access tile/s and bat access gap adjacent to the chimney. And
- details and location in the loft of the integral/internal maternity bat tube or box for crevice dwelling bats that is proposed.

I request a condition securing submission of a closing out report within one month of substantial completion of the roofing works, setting out the compliance checks and results of internal inspections of Pandora's loft imposed.

Conditions & Reasons (if required)

Awaiting revised bat access mitigation proposals.

Condition: Any works affecting the roof and loft shall only be undertaken under the supervision of an appropriately qualified ecologist Bat licence holder with experience of supervising roofing works 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. Within one month of substantial completion a short closing-out report demonstrating that the ecological mitigation and enhancement measures have been implemented to the satisfaction of the Owner's Ecologist and detailing any bats or signs of bats found is to be issued to the council

If any pre-commencement check results indicate that development will result in ecological impacts not previously addressed, then 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 Method Statement and timetable.

Reason: To ensure that protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF Section 15, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Before the development hereby permitted is commenced, details of the materials to be used in the construction reroofing of the building shall have first been agreed by the supervising ecologist. Development shall not be carried out other than in accordance with the so-approved details.

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

Date:	07/07//25	Signed:	T Cuss
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