

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251178
Address:	The Old Vicarage, Church Lane, Grazeley, Wokingham, RG7 1LD.		
Proposal:	Householder application for the proposed erection of 1no. detached two storey outbuilding consisting of garage / workshop with habitable accommodation on first floor plus widening of existing driveway.		
Type of Development:	Other Householder		
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 read the Great Crested Newt Statement (John Wenman Ecological Consultancy, Ref R2514_GCN_a, June 2025) and Heritage Assessment Design and Access Statement, and reviewed the submitted plans and elevations. I have also reviewed site and local planning history.

Paragraph 5.1.5 of the GCN Statement acknowledges that the location of the proposed new garage and studio building, associated driveway widening are included in the Traditional Orchard Priority Habitat Inventory. *“(i.e. a priority habitat identified in the UK Biodiversity Action Plan and listed as being of principal importance for the purpose of conserving or enhancing biodiversity, under Section 41 of the Natural Environment and Rural Communities Act 2006). The photos included in R2514_GCN_a, JWEC’s previous GCN and Bat surveys and Great Crested Newt Initial Assessment (Species Ecological Consultancy, 20 January 2023) confirm the proposed development is located in the orchard habitat. The Ecologist’s description of the field as being dominated by Yorkshire fog (*Holcus lanatus*) with occasional meadow forbs such as Common knapweed (*Centaurea nigra*) is consistent with unimproved or semi-improved MG5 neutral grassland.*

The GCN Statement suggests that management of the orchard may have changed or intensified in recent years. I am concerned that the site could have been

deliberately degraded. Any future reports must include details of events or management changes and the implications on the priority habitats and wildlife.



Photograph 3. Small apple tree likely within development footprint.



Photograph 4. Multi-stemmed walnut likely within development footprint.

Photo 18: Orchard off-site to west with short, mown improved grassland that is unsuitable for GCN.



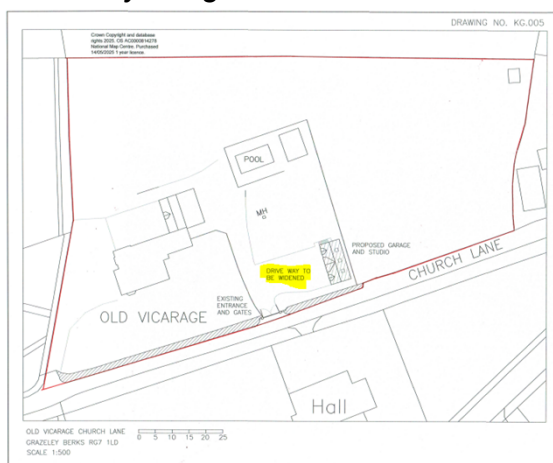
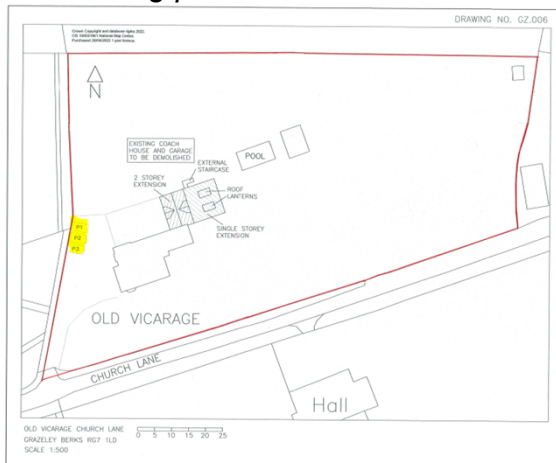
Photo 1: Aerial photograph of 2023).



Planning Permission 232667 Block Plan Dwg GZ.006 shows three parking spaces to the west of the Old Vicarage. The Application Form stated that the proposals to demolish the existing side/rear coach house and garage would not have any impact on vehicle parking. The current submitted Heritage Assessment Design and Access Statement which states *“The replacement of the garage and coach house has been approved under a separate planning application. The applicant would prefer to have sufficient secure parking for several vehicles and garden equipment due to the isolated location”*. No access changes were proposed under 232667 and the house is described as fenced and having a gated access.

Contrary to the requirements of planning policy and BS42020 the Heritage Assessment Design and Access Statement has not demonstrated any overriding need for a garage and a studio which removed from the house. The loss of habitat of principal importance and impact to wildlife are not justified. The HDAS states *“Previously a large outbuilding was removed from near the tennis court due to poor structural condition”*. The consultant states that the house sits on a large plot of approximately 2 acres. All the alternatives that have been ruled out and justification for the loss of priority habitat and impact on wildlife should be assessed in order to

comply with planning policy. I must also disagree with the statement that “near to the existing pool house and towards the boundary hedge”.



I am concerned by additional proposals to further to create a large area of hard standing and car parking in front of the proposed studio and garage building. From my review of site planning history and aerial and Streetview photos, I am concerned about tree and hedgerow removal and loss of grass that has been undertaken to widen the drive and construct a pool house, potentially without planning approval. Please confirm if the Volume Calculations provided in the HDAS are correct and take account of the new pool house and driveway? The extent of the hardstanding and in combination effects of habitat have not been assessed by the Ecologist, appear unnecessary and would be unlikely to satisfy the requirements of the mitigation hierarchy.



The direct and indirect impacts on wildlife of the loss of a mature Walnut tree and other fruit trees shown in Proposed Ground Floor Plan and Site Plan Dwg KG.005 and GCN Statement have not been considered. No roost assessment appears to have been undertaken of the trees. The proposals have taken no account of the Whiskered or Bradts and Brown long-eared bat maternity roost on the east of the house or loss of foraging and commuting. The cumulative impact of removal of trees, hedges and roosting features which have been lost to facilitate widening of the drive have not been considered. In the absence of further ecological appraisal, I cannot advise that there would have no direct or indirect negative impacts on

protected species including nesting birds, foraging and commuting bats and wildlife would be maintained.

To comply with NPPF paragraph 187 the decisions should ensure proposed development contributes to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs. NPPF 193 states that when determining planning applications, local planning authorities should apply the following principles: *“c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists”*.

According to Local Plan policy CP3d) planning permission will be granted for proposals that maintain or enhance the ability of the site to support fauna and flora including protected species. Development proposals will be required to demonstrate how they have responded through the submission of Design and Access Statements, clear and informative plans. CP7 states that development which may harm habitats or, species of principle importance or features that are of major importance for wild flora and fauna, whether directly or indirectly, or will be only permitted if it has clearly demonstrated that the need for the proposals outweighs the need to safeguard the nature conservation importance, that no alternatives site that would result in less or no harm is available which will meet the need. And Mitigation measures can be put in place to prevent damaging impacts.

Summary

The applicant has not demonstrated a need for the development in this position overrides the need to safeguard nature conservation importance and no alternative site would result in less or no harm. The applicant has failed to justify the loss of neutral grassland and traditional orchard Priority Habitat, and loss of a mature Walnut tree and fruit trees, nor demonstrate that alternatives have been considered. No mitigation can be secured in the absence of assessment of impact and proposals to avoid and compensate loss and provide enhancements.

The application should be refused on grounds of loss of habitats of principal importance and detrimental impact to wildlife and biodiversity and failure to comply with Section 15 of the NPPF, WBC Local Plan policies CP1, CP3 and CP7 and MDD TP23.

Conditions & Reasons (if required)

Date:	03/07/2025	Signed:	T Cuss
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