

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	242953
Address:	The Horns Inn, Crazies Hill, Wargrave, RG10 8LY.		
Proposal:	Full application for the proposed change of use of part of the upper floor to guest accommodation (Use Class C1) and part to flexible Class C1 and E use; erection of a replacement gazebo with PV panels, removal of decking and 2 no. existing sheds and erection of 1 no. shed, plus landscaping and external alterations to the building including changes to fenestration and erection of a single storey canopy roof to the side.		
Type of Development:	Other Change of Use		
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 Preliminary Roost Assessment (Arbtech, 10 May 2024) and Emergence Survey Report Bats (Chase Ecological Consultancy, Ref CE1119-01, September 2024), Planning Statement (Heritage Revival, 3 December 2024) and Design & Access and Heritage Statement (Heritage Revival, 3 December 2024). I have also reviewed the application form and plans and elevations submitted in support of applications 242953 and 242954.

The Preliminary Roost Assessment (PRA) recorded a complex roof structure, the majority of which is clad in clay tiles, and the lower half of the eastern extension is clad in slate tiles. There are numerous chimneys on the building. According to Arbtech's Ecologist, the site is located in a semi-rural part of Reading surrounded by large arable fields and woodland pockets. Owing to the surrounding mature trees and the proximity of a water body to the southwest of the sit the onsite habitat value for bats is assessed as optimal. Two large and two small loft spaces were surveyed in the pub/restaurant building B1. Numerous raised or missing tiles on the southeast, north elevation provide gaps which crevice-dwelling bats could exploit. The sub roof on the northeastern elevation had areas of cracked slate tiles which provide potential roosting features for crevice-dwelling species. The temperature

and relative humidity of the cellar and loft spaces are recorded in PRA Appendix 4. It appears that Arbtech did not complete a roost assessment for the barn.

Arbtech state that four surveyors are required to provide full coverage of the building. For the emergence survey Chase Ecological consultancy's surveyors were not located in the car park opposite the northeastern slate-clad elevation and 1 was positioned further to the northwest beyond the gazebo further from the rear of B1. Chase Ecology's surveyors were equipped with EMT 2 Pro/Nightfox infrared cameras and no additional static cameras appear to have been used, survey locations added or amended following recording Common pipistrelle emergence on the 2nd survey on 10 August. Emergence Survey Section 5 Phase 2 Activity Survey does not make clear which bats were recorded, observed or filmed.

While the individual daytime roosts identified in Roost 1 and Roost are not maternity roosts and are not likely to be hibernation roosts the need to monitor temperature and humidity must be taken into consideration in line with Good Practice Guidelines paragraph 7.3.13 in order to ensure installation of 2 ensuite bathrooms and associated extractors, plumbing and heating etc do not negatively impact on Roost 2 during construction or when the bathroom is operational and where necessary a European Protected Species Licence can be secured. The Guidelines state that where proposals will result in the loss of a maternity or hibernation roost, the temperature and humidity inside and outside the roost must be monitored. Collection data inside and outside the roost will help determine is the damping of temperature variation, rather than absolute temperatures, that make a roost suitable and replicate conditions, where appropriate. It appears that Chase Ecology did not undertake monitoring of internal temperature or humidity during the emergence surveys and have not considered the impact of adding and ventilating two bathrooms in the loft space and disturbance to roof coverings that may be necessary.

Appendix 1: PRA plan



Google Map View to show locations of surveyors.

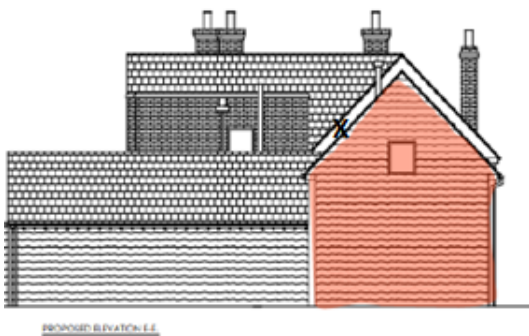


According to the Design & Access and Heritage Statement, in order create a space designated for manager/chef accommodation and/or guest accommodation the existing first floor bathroom is proposed to be made private ensuite provision. The Statement proposes that the existing plumbing will be reused, and the new wall replaces a modern C20 construction. Existing windows area proposed be retained.

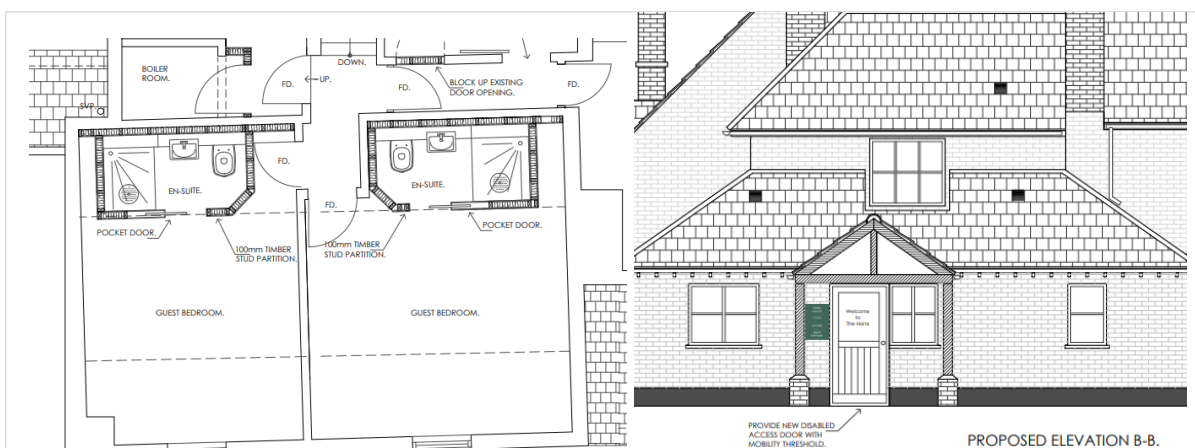
During the nocturnal bat emergence surveys undertaken on 14/07, 10/08, and 02/09/2024 a maximum count of two single Common pipistrelle bats were recorded emerging from Roost 1 - South/West gable claddings/eaves; and Roost 2 – Common Nort/East facing lower roof coverings.

The Emergence Survey Report proposes that no European protected species licence will be required if the avoidance measures in appendix 1 are maintained at all times. The red zone on the rear northern elevation is shown adjacent to but not to include the “*Nort/East facing lower roof coverings*” shown in the photograph of emergence point two. The red zone shows the northwest facing barn roof which extends well below the Emergence point 2 identified by the yellow star on the lower part of the rear elevation slope of the main roof. I therefore disagree that not undertaking works in the proposed red zones will avoid disturbance, impacts or modification the Bat Roost 2. As a result, the application and emergence survey fail to demonstrate that there would be no requirement for a Europeans protected species mitigation licence.

Emergence Two



I request that the Emergence Survey Report is corrected and also updated to take account of direct and indirect impacts of the development proposals to install first floor ensuite bathrooms adjacent to Roost 2. In addition, the revised assessment must take into account the ventilation for the ground floor toilets and first floor kitchen shown the slate roof and west-facing tiled roof above, as shown in Proposed Elevation B-B.



The PRA report proposes that a low impact lighting strategy will be adopted for the site during post-development which outlines the areas of the site that will be retained as dark corridor. The lighting scheme has not been submitted and a lighting strategy should therefore be secured by condition or including in revised submissions.

The Emergence Survey Report does not assess or propose mitigation for the new overdoor lighting proposals outlined in the Design & Access and Heritage Statement. All external light must comply with best practice guidance including [Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23](#). Submission and approval of a biodiversity-friendly lighting scheme should be submitted with applications 242953 and 242954 or a prior to commencement external lighting scheme condition must be imposed to ensure bat roosts, access points and commuting and foraging routes are not obstructed. The existing inappropriate floodlighting should be reviews and adjusted to mitigate for the impact to protected species in line with the NPPF and Local Plan policy.

Installation of at least two bird boxes integrated into buildings or on mature trees in the adjacent woodland recommended by Arbtech will provide additional nesting habitat for birds e.g. Schwegler No 17 Swift Nest Box (buildings), Bark Boxes Blue Tit 25mm (trees), Woodstone Nest Box (buildings or trees), or a similar alternative brand. Arbtech's Ecologist recommend that habitat creation could be considered to enhance opportunities at the site for foraging and commuting bats post development including native trees and native flowering shrubs. To ensure not net loss of biodiversity the development must mitigate, compensate and ensure that the development including replacement extended canopy and car parking maintain and provide benefit for wildlife. To use the opportunity of managing and improving the bluesline woodland in the new owner's control I ask that the applicant seeks advice from the Ecologist or WBC Green Infrastructure Team on maintenance of trees and woodland and help that may be available to the owners and local community.

I am happy to discuss the Mitigation & Protection measures with the applicant's Ecologists and to comment on a revise survey report and mitigation strategy when they have been received by the LPA.

Conditions & Reasons (if required)

Awaiting revised Emergence Survey Report with bat mitigation strategy and clarification on works proposed.

Date:	3/1/2025	Signed:	T Cuss
--------------	----------	----------------	--------



Image 22: North elevation of Barn and service yard



Image 23: View southwest of Kitchen and service yard



Image 25: West elevation of C20 extension