

# MEMORANDUM

<b>From:</b>	Tina Cuss Ecology Officer		
<b>Service</b>	WBC Ecology	<b>App No:</b>	250010
<b>Address:</b>	71 London Road, Wokingham, RG40 1YA.		
<b>Proposal:</b>	Full application for the proposed change of use of the property to supported living accommodation (Use Class C2), plus erection of a two storey front/side extension and a single storey side/rear extension, associated landscaping, parking, installation of PV panels and bin storage, following demolition of the existing attached garage and single storey rear extension.		
<b>Type of Development:</b>	Other Change of Use		
<b>Site Visit Made:</b>	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 Ecological Appraisal and Roost Assessment (Arbtech, 26 November 2024), Biodiversity Net Gain Assessment (Arbtech, December 2024) Arboricultural Implications Assessment and a BS5837 Arboricultural Method Statement (Merewood, 12 December 2024). I have also reviewed the Statutory Biodiversity Metric and plans and elevations submitted in support of the application.

### Preliminary Bat Roost Assessment

According to the PRA there are a small number of lifted roof tiles on the main section of the house and the hip tiles don't appear to be tightly fitting. However according to the internal inspection the area so missing mortar do not continue deep enough to provide a suitable roosting feature. The Ecologist states that there was no light ingress or direct points of access in void V1. They suggest however bats may be able to access the loft via the lifted tiles. A high volume of the slate tiles on the extension are lifted including gaps between the end tiles and lifted ridge tiles. The lead flashing between the main house and the garage is lifted.

I agree that B2 and B3 have negligible suitability for roosting bats. I don't fully support the conclusion that the house B1 has moderate suitability for roosting bats. I understand the Ecologist was only able to inspect the loft from the hatch and could

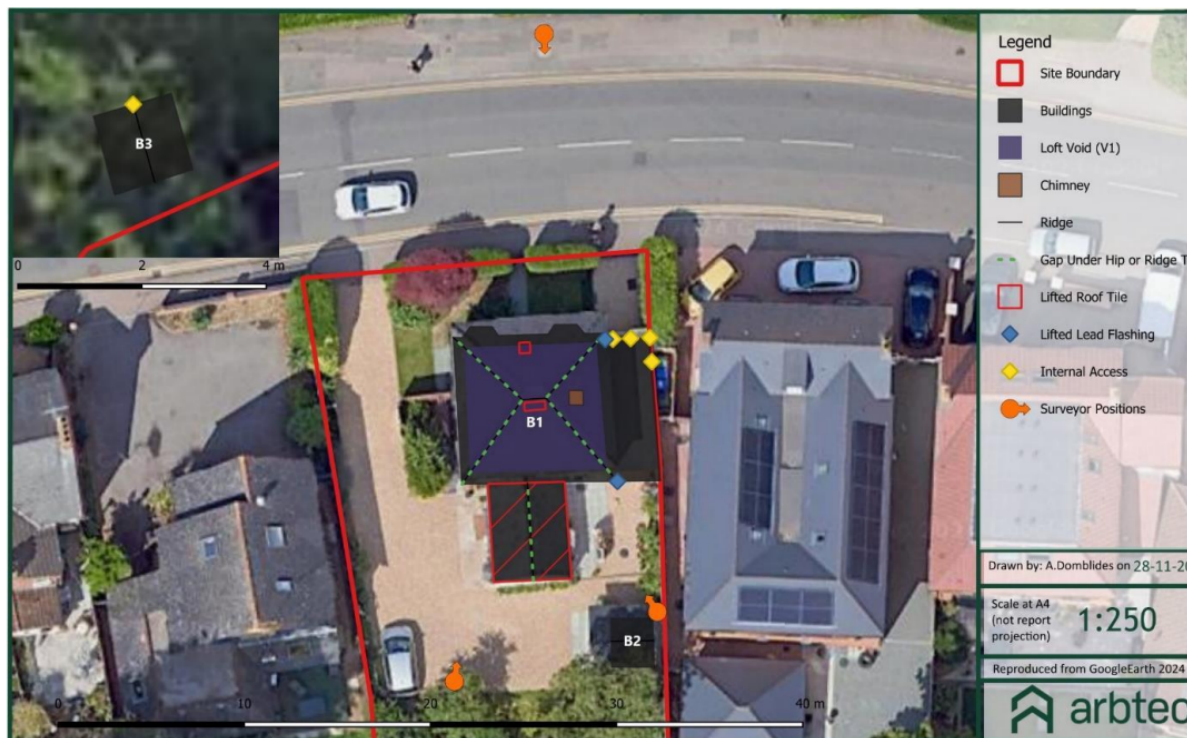
not inspect the garage roof tiles without accessing the neighbouring property which is in the same ownership. The ecologist recommend that two bat emergence surveys are needed to confirm presence/likely absence in the building.

Bat Surveys for Professional Ecologists Good Practice Guidelines Ed 4 paragraph 5.1.12 and Table A1.1 state that crevices will require inspection using torches, mirrors and endoscopes. A daytime bat walkover requires appropriate bat survey licences if an ecologist needs to enter buildings or investigate with a torch or endoscope.

I suggest consideration is given to the recent replacement of the main roof. I note that the membranes are not stained which may suggest that the gaps do not provide access or are not being used. Endoscope surveys of the potential roosting features in raised tiles and ridge tile mortar and well as the multiple features in the extension which will be demolished may be undertaken to confirm whether the gaps are deep enough or obstructed. If further daytime surveys confirm that suitable roosting features will be directly lost or temporarily disturbed one or more emergence surveys should be undertaken between May and August. I request submission of an addendum or revised Preliminary Roost Assessment prior to determination of the application or the completion of the emergence surveys recommended by the Ecologist. The scale and permanence of impacts of the 2-storey extension and installation of solar panels on the potential roosting features on the main roof should also be considered in the designs of mitigation, avoidance and compensation measures to provide new features for crevice-dwelling bats as well as further surveys which need to be undertaken.

I support the recommendation for installation two integrated Ibstock Swift Eco Habitat bricks to provide additional nesting for birds at least 5m above the ground which should be secured by condition.

#### Appendix 2: PRA Plan



### **Preliminary Ecological Appraisal & Arboricultural Impact**

I agree with the findings of the habitat survey. I support the enhancement opportunities for planting of native shrubs along the boundaries and in the southern extension to the garden. Given the location of the property and benefits for nesting birds and foraging I would not advise that Cotoneaster needs to be removed. Wall mounted flower planter troughs should only be installed if they will be maintained by residents. I request that planning conditions which secure ecological mitigation and enhancement, and landscaping include provision of 150mm gaps in boundary fences.

According to the Proposed Site Plan (Christopher James, Dwg350-1207-G), Biodiversity Net Gain Assessment and PEA/PRA the front privet hedge and a mature apple tree in the back garden will be protected and retained. Ornamental shrubs including Buddleia, Cotoneaster will be removed to facilitate the development. According to the Arboriculturist and the Tree Protection Plan the apple tree would be removed. I request that the AMS and TPP are therefore revised in line with the Proposed Site Plan to ensure the retention and protection of this feature tree and additional fencing and where necessary permanent ground protection is shown in a revised Proposed Site Plan. Implementation of the development in line with the revised AMS and submission and approval, implementation and long-term retention of retained trees and hedges, replacement trees, new species-rich hedging and landscaping enhancements for wildlife should be secured by condition in line with policies CP3, CP7 and TB23.

### **Biodiversity Net Gain Assessment**

I agree the baseline habitat value of the site is 1.67 area-based habitat units, comprising 1.56 units of scattered trees, 0.09 units of vegetated garden, 0.01 units of ground level planters and buildings and 0.02 hedgerow units. While I support the proposals for new habitats set out in the Biodiversity Net Gain Assessment report, I am not satisfied that neutral grassland habitat on-site in a private garden can be appropriately maintained and monitored for 30 years as assessed and that a S106 agreement can be entered into. I advise that off-site compensation and net-gain should be secured with a biodiversity gain condition to submit for approval prior to a Biodiversity Gain Plan. Planning conditions and a S106 should secure setting out, maintenance and retention of the habitat enhancements proposed in order to ensure wildlife and protected species are retained and enhanced in line with policies CP3, CP7 and TB23.

Removal of the Apple tree would require the notes and habitat retained in the biodiversity metric to be altered. I welcome confirmation whether the 0.0407 units for Individual Tree on-site habitat created are calculated in line with July 2024 updated guidance.

### **Summary**

Circular 06/05: states that: *"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision"*. In order to determine the application, further information must be provided to rule out impact to bat roosts or bats in either the extension or the main roof, and mitigate

and avoid detrimental direct or indirect impacts to bats from all works proposed to B1.

### Conditions & Reasons (if required)

Subject to submission of further survey information and bat avoidance mitigation strategy I recommend the following planning conditions should be included in the decision notice if the application is approved.

As of 2nd April 2024, a 10% Biodiversity net gain (BNG) for minor developments is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under the statutory framework for biodiversity net gain, this planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met (the biodiversity gain condition). The biodiversity gain condition is a pre-commencement condition: Once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development.

Development may not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the plan

For further details, please see <https://www.gov.uk/guidance/submit-a-biodiversity-gain-plan>.

**Condition:** Unless otherwise agreed in writing by the council all works are to be carried out in full accordance with the recommendations for protected species mitigation and biodiversity enhancements for hedgehogs, birds and reptiles given in Preliminary Ecological Appraisal and Roost Assessment (Arbtech, 26 November 2024). Within one month of substantial completion a short closing-out report demonstrating that the ecological mitigation and enhancement measures have been implemented is to be issued to the council.

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

**Condition:** At no time shall external lighting be installed on the site or affixed to any buildings on the site without the prior written approval of the local planning.

**Reason** To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF paragraph 198 Section 15 (Conserving and Enhancing the Natural Environment), Core Strategy policies CP1, CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

### Condition CL7 Protection of trees and shrubs

a) No development or other operation shall commence on site until an Arboricultural Method Statement and Scheme of Works which provides for the retention and protection of trees, shrubs and hedges growing on or adjacent to the site in accordance with BS5837: 2012 has been submitted to and approved in writing by the local planning authority. No development or other operations shall take place except in complete accordance with the details as so-approved (hereinafter referred to as the Approved Scheme).

b) No operations shall commence on site in connection with development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening or any other operation involving use of motorised vehicles or construction machinery) until the tree protection works required by the Approved Scheme are in place on site.

c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within an area designated as being fenced off or otherwise protected in the Approved Scheme.

d) The fencing or other works which are part of the Approved Scheme shall not be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery and surplus materials removed from the site, unless the prior approval in writing of the local planning authority has first been sought and obtained.

**Reason:** To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of amenity value to the area, and to allow for verification by the local planning authority that the necessary measures are in place before development and other works commence. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policies CC03, TB21 and TB23.

**Condition:** Prior to the commencement of the development, full details of both hard and soft landscape proposals shall be submitted to and approved in writing by the local planning authority. These details shall include, as appropriate, proposed finished floor levels, means of enclosure, car parking layouts, and pedestrian access and circulation areas, hard surfacing materials and minor structure (e.g., play equipment, refuse or other storage). Soft landscaping details shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate, and implementation timetable.

All hard and soft landscape works shall be carried out in accordance with the approved details in accordance with a timetable approved in writing by the local planning authority. Any trees or plants which, within a period of thirty years after planting, are removed, die or become seriously damaged or defective, shall be replaced in the next planting season with others of species, size and number as originally approved and permanently retained

**Reason:** To ensure that there is no net loss of biodiversity habitat and wildlife and protected not adversely affected by the proposals. Relevant policy: NPPF Section 15, Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

**Condition:** No grassland should be cleared, retained tree shrub or hedgerow be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the written approval of the local planning authority. If within a period of 30 years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted at the same place, unless the local planning authority gives its written consent to any variation.

**Reason:** To ensure that there is no net loss of biodiversity habitat and wildlife and

protected not adversely affected by the proposals. Relevant policy: NPPF Section 15, Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

**Condition:** No buildings, enlargement or alterations, enclosure, swimming pool, or container for the storage of oil or liquid petroleum gas permitted shall be carried out without the express permission in writing of the local planning authority

**Reason:** To safeguard the biodiversity of the area. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

<b>Date:</b>	30/01/25	<b>Signed:</b>	T Cuss
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