

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	250722
Address:	The Coach House, Five Horseshoes House, White Hill, Remenham Hill, Wokingham, RG9 3EP.		
Proposal:	Full planning application for the proposed erection of 1 no. detached dwelling following demolition of the existing Coach House, plus associated landscaping.		
Type of Development:	Minor Dwellings (1-9)		
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 Ecological Appraisal & Biodiversity Net Gain Assessment (Windrush Ecology Ref W6228 19-02-25final) and the covering letter (Lichfields, Ref 64051/01/DL/ERo/33456914v10, 21 March 2025). I have also reviewed the Statutory Metric, Condition Assessment Sheets, the plans and elevations submitted in support of the application and the Protected Species Survey Report (Windrush, Ref W4068_14-06-21) and Level 2 Recording (Pegasus Group, Ref P19-1161 submitted in support of permission 213116.

Protected Species

All species of British bat are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as amended. Under this legislation it is an offence to deliberately or recklessly to destroy or damage their roosts, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from Natural England in England. A bat roost is interpreted as "any structure or place used for shelter or protection" whether or not bats are present at the time.

Nesting birds are protected under the Wildlife and Countryside Act 1981 (as amended), which makes it an offence to intentionally kill, injure or take any wild bird or take, damage or destroy its nest whilst in use or being built, or take or destroy its eggs.

According to the Preliminary Ecological Appraisal (ref W6228 19-02-25final) and the Agent's covering letter it appears that gaps under slate roof tiles around a number of the brick chimney stacks and the lifted ridge tiles of Five Horseshoes House which could provide potential roosting features or access gaps for bats in have been repaired the roof has been replaced. The Ecologist does not make reference to Protected Species Survey Report (Windrush, Ref W4068_14-06-21). Therefore, contrary to best practice, it does not appear this previous assessment has been taken into account. However, I am satisfied that the survey methodology for the Coach House is adequate to conclude this building currently has negligible bat roosting potential. The Careful Work Practices avoidance measures, mitigation and species enhancements recommended in Section 6.3 of W6228_rep_19-02-25final should be secured by planning condition.

In order to recommend approval of the current application to ensure the site is maintained and enhanced for bats, I request that an enhancement scheme for including of integral bat tubes or boxes such as the Schwegler 1FQ or 1WQ bat boxes on buildings around the site is secured. Bat boxes should be installed as high as possible on the exterior walls, just under the eaves on a south or west facing elevation of the Five Horseshoes and the Coach House.

If the application is approved planning conditions and/or S106 obligations should be imposed to ensure that direct there are no changes in use of the blue line field to the north to ensure that off-site wildlife has been considered and will be maintained and protected in accordance with policy. I request that permitted development rights are removed to avoid cumulative direct or indirect impact on wildlife on the boundary hedges and blue line land.

Biodiversity Net Gain and Habitat Assessment

According to PEA & BNG Assessment Section 3.2.4 there is only one tree within the garden. Section 4.2.2 states there are no impacts on hedgerows. However, the Existing Site Plan shows a number of dead trees which would have been identified in an Arboricultural Impact Assessment that should have been required to validate the application. It is not clear why trees have died and whether locate the new building against the hedge is sustainable. If the application is approved, I request submission and approval of an Arboricultural Method Statement to protect wildlife using the boundary biodiversity habitats for nesting, foraging and commuting.

I agree with the Trees & Landscape Officer that a comprehensive new landscaping scheme that addresses enhances the western boundary hedge and includes some hedgerow trees planted and proposals to enhance the site for wildlife should be secured in order to approve the application.

Biodiversity Net Gain

According to Section 5.2, 0.04 ha of Developed land: sealed surface habitat would be lost, and 0.8 ha of vegetated garden will be retained and 0.0421ha of vegetated garden created. The individual good condition oak tree is assessed as 0.22 units.

If the application is approved, to secure the proposed 29.66% on-site biodiversity net gain, a Biodiversity Gain condition and implementation of the gain plan should be included in the decision notice.

Conditions & Reasons (if required)

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.

The biodiversity gain plan must include:

- a. information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;
- b. the pre-development biodiversity value of the onsite habitat;
- c. the post-development biodiversity value of the onsite habitat;
- d. any registered offsite biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development;
- e. any biodiversity credits purchased for the development; and
- f. any such other matters as the Secretary of State may by regulations specify.

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 boundary treatments with hedgehog gaps, car parking layouts, and pedestrian access and circulation areas, hard surfacing materials and minor structure (e.g. 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 protected and priority species are 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: Prior to commencement of development details as scheme of biodiversity enhancements shall be based on recommendations given in Section 6.3 of the submitted Preliminary Ecological Appraisal & Biodiversity Net Gain Assessment (Windrush Ecology Ref W6228 19-02-25final) and in Sections 6.2.3

and 6.3.1 of the submitted Protected Species Survey Report (Windrush Ecology, ref: W4068_rep_Five Horseshoes, Remenham Hill_14-06-21, June 2021.

The details of the scheme shall include:

- a) A timetable for its implementation,
- b) Detailed proposal for integrated bat tubes into the new building,
- c) Schwegler Woodcrete boxes designed for buildings (e.g. the Schwegler 1FQ or 1WQ bat boxes) to be installed as high as possible just under the eaves on the exterior walls on buildings on the site.
- d) Proposals for integration of bird boxes such as Swifts and House sparrows (e.g. Manthorpe Swift Brick and Schwegler Brick Box Type 2 (or similar equivalent) into buildings on the site.

The biodiversity enhancements shall thereafter be completed and maintained as approved. 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 is to be issued to the council.

Reason: To ensure that protected and priority species are maintained and features for wildlife are enhanced. Relevant policy: The NPPF Section 15, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Unless otherwise agreed in writing by the council all works are to be carried out in full accordance with the advice given in Section 6.3.1 and 6.3.2 of the Preliminary Ecological Appraisal & Biodiversity Net Gain Assessment (Windrush Ecology Ref W6228 19-02-25final).

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

Condition: Prior to commencement of development a site-wide "lighting design strategy for biodiversity" for designed in accordance with best practice including in accordance with Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23 shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a) identify those areas/features on site that are particularly sensitive for bats, *amphibians and birds* and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b) show how and where (through the provision of appropriate lighting contour plans and technical specifications) external lighting will be installed or amended so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

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, CP7 and Managing Development Delivery Local Plan policy TB23.

Condition:

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 wildlife and amenity value to the area. Relevant policy: Local Plan Core Strategy policies CP1, CP3, CP7 and Managing Development Delivery policy TB23.

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

Reason: To safeguard the Countryside and amenity value to the area. Relevant policy: NPPF Section 15 (Conserving and Enhancing the Natural Environment), Local Plan Core Strategy policies CP3 and CP7, and Managing Development Delivery policy TB23.

Date:	08/07/25	Signed:	T Cuss
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