

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	242506
Address:	Aston Rise, Remenham Lane, Remenham, Wokingham, RG9 3DE.		
Proposal:	Householder application for a proposed two storey side/front extension (with loft accommodation) and part single storey/part two storey rear extension following demolition of existing single storey side projection and rear extensions together with associated changes to fenestration and provision of 3 x additional triangular roof dormers. Demolition and replacement of existing porch and demolition of existing detached ancillary cottage and garage with associated hard and soft landscaping works.		
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 Bat Report Aston Rise (Ecology by Design, Ref EBD03725, 13 September 2024) and Bat Report Aston Rise, Aston (Ecology by Design, Ref EBD03725, 13 September 2024), Planning Design and Access Statement, Arboricultural Impact Assessment – House Project Rev C (Sylva Consultancy, July 2024) and the Heritage Statement. I have also reviewed the plans and elevations.

Arboricultural Impact Assessment

According to the Arboricultural Impact Assessment (AIA) section 4.4.2 no trees require removal to implement the scheme. However, sections 4.7 and 4.8 of the AIA have not assessed the impact of the installation of steps or proposed any fencing or Construction Exclusion Zone to retain and protect Oak tree T12.

I understand Dwg PL1410 has been superseded by PL1410 Rev A and ground works to, and in front of the terrace have been withdrawn and the works to the slope east of T12 are limited only to installaton of steps and no groundworks or material

construction is now proposed to the front of the house. According to the Planning Design and Access Statement the Root Protection Area of the Oak T12 with a radius of 12.48m would be affected by the groundworks shown in tsection 13.0 of the Planning Design and Access Statement. In order to support the installation of the steps proposal set out in the Planning Desgn and Access Statement should be revised and must demonstrate to ensure that T12 is retained and protected and there is no net loss of biodiversity habitat, features which support wildlife are retained and there is adquate information to assess, avoid and mitigate impact on habitat and feature.

AIA section 4.8 states that the Arboricultural Impact Plan (Appendix 5) illustrates that sufficient room existis to locate the site compound and contractor parking outside the RPA's of all retained trees. Braced Heras fencing based on figure 2 'Default Sepcification for Protectective Barrier" as recommended in BS5837:2012 and ground protection measures such as Duradek Mats will be required to facilitate access for the works. The AIA is dated June 2024 and paragraph 4.8.5 states that new service runs have not been finalised. Therefore currently no details of the mitigation and protection measures for for the veteran dying Cedar or for Magnolia T20 to safeguard during demolition of the annex, construction and excavation of the Soakaway 1 and 2 attenuation tanks are provided in a Tree Protection Plan or detailed Arboricultural Method Statement. The Proposed Drainage Layout (Centrespace, Ref 2600A 00-1002) does not highlight the need to retain and protect identify the veteran Cypress during excavation and operation of soakaway.

In order to recommend that the no trees would have to be removed, and all trees and hedges would be retained, safeguarded and adequately protected I request that WBC condition CL78/CL8 is imposed and the scheme and Tree Protecion Plan must include protection for Oak T12, the dead Cedar and Magnolia T20 as well as all hedges and trees impacted by demolotion, construction, contractor compound and set-up and landscaping works including the terrace and steps to the slop to lower level northern grassland.

Biodiversity Habitat

Change use of the northern end of the site to garden or planting of ornamental trees could result in the loss of biodiversity habitats. No habitat survey has been provided of the grassland and the slope of the earthworks described above and proposals are unclear whether the grassland habitat would be retained and managed, or landscaping is proposed which would result in loss of biodiversity habitat. The Bat Report failed to assess the veteran Cedar tree and identify that this is irreplaceable habitat which should be retained and protected. In the absence for further information regarding proposals for the northern field, and retention and conservation of semi-improved an species rich grassland, veteran Cedar tree, detailed landscaping proposal and a Tree Protection Plan which protect Oak T12 during construction of central steps into the slope the application does not comply with the Local Plan requirement for no net loss of biodiversity and habitat for wildlife, the NPPF, and Circular 06/05.



Figure 8. View from within the private garden back towards the main dwelling



Protected Species Assessment & Mitigation

The Daytime Bat Walkover and Preliminary Roost Assessments (DBW & PRA) concluded that the house B1 is assessed as a confirmed roost of moderate suitability for roosting bats.

The submitted 22-page Bat Report “Aston Rise, Aston” assesses annex building B2. Daytime Bat Walkover and Preliminary Roost Assessments (DBW & PRA) inspections for B2 record that both the northern and the southern roofs are open at the eaves (PRF-8) and approximately 5% of the tiles on the roof are damaged, broken or missing. There is also a broken ridge tile on the southern roof (PRF-9). This provides suitability for crevice dwelling bat species.

One emergence survey was completed on 25 June 2024. No bats were recorded emerging from the building during the survey. The Ecologist concludes that B2 has negligible roost potential, and the site has suitability for commuting and foraging bats however, with commuting lines observed between the north of B2 and the south-east of B1.

Recommendations are made for biodiversity-sensitive lighting and the inclusion of an integrated bat box to be secured. I must disagree that that 2F Schwegler bat boxes are integral, and that installing a bat box in a tree provides replacement for the potential roosting feature in B2 which according to Local Plan policy should be compensated and enhancement provided. If the application is approved, I request that both integral Habitat box or equivalent box replaces the PRF in the demolished annex block as well as a 2F Schwegler is installed on retained mature tree in the redline site or adjacent woodland.



Integrated bat boxes

Integral or integrated bat boxes can be built into the walls or masonry of houses and other buildings. The boxes can be embedded such that they do not impair the air-tightness of the building.

Many designs are available including some that have bespoke coverings that can match the building façade and / or highlight the boxes presence. The same principles for size, location and access apply.

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Workshop B3 was recorded as having suitability for crevice dwelling bat species with between 2% to 5% of the roof's tiles are lifted, broken or missing (PRF-10). Weatherboarding is present on the exterior walls. The emergence survey of B1 and the position of the bat surveyors was not adequate to rule out the presence of a roost in and impact to bats in B3. No detailed mitigation has been proposed to prevent and reduce the likelihood of disturbance during demolition of B2. Mitigation strategies must take account of direct and indirect impacts of the demolition of B2 on any protected species in retained B3. The Planning Design & Assess Statement refers to retention of "*the existing workshop and store building (also secondary accommodation)*". The Owner should be aware of the potential of the Workshop B3 to support bats and that any repair works, changes of use, or increased occupation and use of the light polluting floodlight may cause illegal impact on bats is present.

The DBW & PRA of the main house B1 recorded a number of Potential Roosting Features (PRF 1 – 7) each provide suitability for crevice dwelling species including: A hole next to the chimney and a gap next to a ventilation pipe, hole near the chimney on the northern elevation. On the southern elevation there were gaps where the edges of the dormer windows meet the main roof, a hole in the brickwork (PRF-2) and lifted lead flashing. In Loft space L1 there is raised platform on the southwestern side with a hole in which there is a accumulated large pile of bat and rodent droppings. There were approximately 50 bat droppings scattered widely on boarding around this hole. The Ecologist reported a hole in the southern gable end wall of this space that has been packed with chicken wire that may have been previous entrance point for bats. There was a dead bird caught in the insulation at the joining between the internally western roof (L1) and the central roof (L2).

Roughly 15 pipistrelle bat droppings that were presumed to be a year or so old and a dead pipistrelle bat were found within Loft L3 in the northeast of the B1. No obvious entry point was observable, no light ingress in the loft space and L3 loft space appeared well sealed and the bat found was not recently dead.

The 32-page Bat Report "Aston Rise" assessed the nighttime roost surveys of the main house (B1). The emergence surveys undertaken on 25 June, 17 July and 14 August 2024 recorded:

- One soprano pipistrelle maternity roost (peak count 28);
- One soprano pipistrelle satellite roost(peak count 15);
- Six soprano pipistrelle and one common pipistrelle day/occasional roosts; and
- Four species of bat actively foraging and commuting within the site.

The soprano pipistrelle maternity roost present within loft space L1 (Roost R1) and its associated satellite roost adjacent to the eastern chimney (Roost R2) are assessed to be of District importance. I consider that the Soprano roost in L1 is of at least District importance. According to Review of the Status of Bats in Berkshire 2020, of the known 363 Soprano pipistrelle roosts, only 53 are confirmed maternity roosts. The roost size on average is much larger than that seen for other species in the county; the maximum count was 604 bats.

The Ecologist notes that bat surveyors were constrained by bright motion-sensor floodlights lights on each elevation of the building. They did not consider to be significant constraint as there were prolonged periods of lights not being active. Paragraph 5.1.6 advises the owner that increased levels of artificial light can cause

disturbance to bats. They advise *“If lighting is intensive particularly from lamps which emit UV lighting it can deter some bats from utilising the site and in some instances can act as a barrier across commuting lines.* The Ecologist however failed to advise the Owner (in either the DBW & PRA letter or Bat Report) that the existing lighting obstructing or the roost and deterring bats with the flood lighting may be causing legal offences under The Wildlife and Countryside Act (as amended) and/or The Conservation of Habitats and Species Regulations 2017 (as amended). I recommend that the Ecologist updates their report and/or advises their client that the flood lighting should be amended as a matter of urgency.

According to the “Aston Rise” Bat Report, the proposals include a Householder Application for a two-storey rear and side extension to the main house, alongside internal reconfiguration and some external repair works. In the absence of mitigation, development within the site may result in:

- Permanent destruction of a soprano pipistrelle satellite roost;
- Obstruction of access to two soprano pipistrelle/one common pipistrelle day/occasional roosts and one (of four) access point into the soprano pipistrelle maternity roost; and
- Disturbance of all roosts within the building during the construction phase, including the soprano pipistrelle maternity roost which is proposed to be retained.

The Bat Report fails to refer to installation of a large double height window and removal of the downpipe, amendments to dormer windows, as well as landscaping works proposed. No elevation or proposals plans are included in the Bat Report. I am therefore concerned that the Ecologist has not included all of the works to the roof in particular installation of three additional triangular roof dormers which it appears would result in further loss of satellite roost in the main house.

The site was assessed to be of high suitability for bats with good connectivity to other areas of suitability to foraging and commuting bats. Section 3.2.2 of both Bat Reports states that any habitats suitable for roosting including trees which could be suitable for bats were noted in the DBW. However, neither DBW and PRA letter includes an inspection of the dying/declining Cedar tree on the west of the rear lawn. As advised above Arboricultural Method Statement must be secured to ensure retention and protection of the veteran tree and prior to any tree works bat surveys must be completed and mitigation proposed to demonstrate that bats and roosts will not be affected, and the veteran tree feature will be retain and conserved.

The side extension to the east will result in the loss of Soprano roost R2. I am concerned that indirect and disturbance impacts of the work proposed to the rear have not been fully considered in the Bat Report. This states that the extension will not result in direct loss of any roost. However, the Ecologist acknowledges the flightpath and access point A5 the maternity roost in L1, and R6 and R3a and R3b will be obstructed. Paragraph 5.1.4 also advised that in the absence of mitigation, repair works to the building (such as brick re-pointing, re-tiling and repair works to timbers/barge boards/soffit boxes) could result in the damage/destruction of all other roosts not lost as a result of the extensions. For example, the repair works at the eaves of loft space L1 would result in the permanent destruction of the maternity roost R1 and re-tiling work would result in the loss of roosts R3a, R3b, R4 and R6.

For the above reasons it is not currently clear that all of the direct and indirect, impacts on protected species have been considered which are material to the planning decision and required by policies CP1, CP3, CP7 and MDD TB23. I request clarification of the development works not assessed by the Ecologist, protection of retained trees and features, and if any tree works to retained veteran cedar tree are recommended by the Arborist, that preliminary roost assessment of the tree and mitigation strategy are submitted to the Local Planning Authority.

I consider that the survey effort for buildings B2 and B1 are however sufficient to support the conclusion that a European Protected Species Mitigation licence must be secured in order for the development to proceed lawfully. 5.1.8 to 5.1.13 outline the likely EPS Licence strategy including provision of four 2F Schwegler bat boxes in mature trees, hand stripping destructive search of roost features R2, R3a/b, R6 and R8 (or installation of exclusion devices), toolbox talk and Ecologist watching brief. In addition, integration of new roosting features to provide minimum 10 access points to soffit boxes and 10 crevice features will be provided. The outline strategy proposes to retain and lock access to loft L1 and provide additional crevice features.

The proposed elevation drawings, including the installation of the double height window and removal of the downpipe, do not demonstrate that R5 will be retained as assessed in paragraph 5.1.10. Further clarification is needed as paragraph 5.1.12 does not set out opportunities for compensation and enhancement at the site for bats as 5.1.10 states. To minimise disturbance to the Soprano pipistrelle maternity roost in R1 internal works in the room below the loft space must be timed to avoid the breeding period April to September, and scaffolding must not be installed adjacent to L1 during this season. The Ecologist states that EPS Licensed works should be timed to avoid the hibernation season November to March given the possibility of pipistrelle bats hibernating in the crevices.

A planning condition must be imposed requiring a copy of the EPS Licence (or an email from Natural England demonstrating that the site has been registered under a Bat Earned Recognition Class Licence) and the NE approved mitigation strategy, must be submitted to prior to commencement of development. The Bat Report fails to include any recommendations for replacement planting to compensate for the loss of herbaceous flowering plants, shrubs and climbers that would be lost, including to the west of Annex B2 and flowerbeds northwest of the B1. In accordance with CP3 and CP7, I request that planning conditions are imposed to secure retention of trees and shrubs and submission, approval and implementation of scheme of landscaping proposals prior to commencement of development.

Summary

Confirmation is needed that ground works will be limited to installation of steps. A habitat survey of the grassland/ pasture to the north of the garden should be submitted or detailed hard and soft landscaping and landscape management are needed. Subject clarification regarding impact of the changes to windows, roof and drain pipes and impact of demolition B2 on B3 is provided, I am hopeful that adequate conditions can be imposed to ensure that the development would not result in the net loss of biodiversity and irreplaceable features, and direct and indirect impacts on wildlife and bats which cannot be compensated.

Conditions & Reasons (if required)

No works shall commence until a European Protected Species Licence for development works affecting bats has been obtained from the Natural England and a copy of the licence and approved mitigation strategy, (or an email from Natural England that the site has been registered under a Bat Earned Recognition Class Licence have been submitted to the council. Thereafter mitigations measures detailed in the licence shall be maintained in accordance with the approved details.

Reason: To ensure that bats, which are protected species and priority species are not adversely affected by the proposals. Relevant policy: NPPF paragraph 191 Section 15 Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: Works are to be carried out in full accordance with the recommendations and compensation given in Section 5.1 of the Bat Report Aston Rise (Ecology by Design, Ref EBD03725, 13 September 2024) unless otherwise agreed in writing by the council.

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF paragraph 191 Section 15, Local Plan Core Strategy policies CP1, CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: Prior to commencement of development, a "lighting design strategy for biodiversity" for the house, workshop and grounds shall be submitted to and approved in writing by the Council. In accordance with up-to-date best practice including BCT/ ILP Guidance Note GN 08 / 2 3 'Bats and Artificial Lighting in the UK' and Section 5.1.6 and 5.1.13 of the Bat Report, the strategy shall:

a) identify those areas/features on site that are particularly sensitive for bats 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 external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) 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.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Condition: Prior to the commencement of the development there shall be submitted to and approved in writing by the local planning authority a scheme of native and wildlife-friendly landscaping, shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), schedules of grassland, trees and shrubs to be planted, and any existing trees or shrubs to be retained, noting species, planting sizes and proposed numbers/densities where appropriate. which shall specify species, planting sizes, spacing and numbers.

Planting shall be carried out in accordance with the approved details in the first planting and seeding seasons following the substantial completion of the development.

Any trees or plants which, within a period of **10** years from the date of the planting (or within a period of 5 years of the occupation of the buildings in the case of retained trees and shrubs) die, are removed or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species or otherwise as approved in writing by the local planning authority

Reason: To ensure no net loss of biodiversity habitat and secure adequate compensation planting and enhancements for wildlife. Relevant policy: Core Strategy policies CP3 and CP7 Managing Development Delivery Local Plan policy TB23.

CL6 Retention of trees and shrubs

No retained tree shall 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 ten 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 not net loss of biodiversity, and that protected and priority species are not adversely affected by the proposals and 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. Relevant policy: NPPF Section 15 Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

CL7 Protection of Trees

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 biodiversity 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 CP1, CP3 and CP7 and Managing Development Delivery Local Plan policies TB23.

CT2/CT3 No Permitted Development no buildings, enlargement or alterations enclosure, swimming or other pool, or 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 character of the area, countryside and habitat for wildlife. Relevant policy: [NPPF Section 15, Core Strategy policies CP1 and CP3 and CP7, and Managing Development Delivery Local Plan policies TB21 and TB 23.

I13 The Workshop B3 hereby permitted shall not be occupied or used at any time other than incidental to the enjoyment of the residential dwelling located on the site.

Date:	24/11/24	Signed:	T Cuss
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