

# MEMORANDUM

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| <b>From:</b>                | Tina Cuss<br>Ecology Officer                                                                                                                                                                                                                                                                                                                                                                                                            |                |        |
| <b>Service</b>              | WBC Ecology                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>App No:</b> | 242953 |
| <b>Address:</b>             | The Horns Inn, Crazies Hill, Wargrave, RG10 8LY.                                                                                                                                                                                                                                                                                                                                                                                        |                |        |
| <b>Proposal:</b>            | 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. |                |        |
| <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 Emergence Survey Report Bats (Chase Ecological Consultancy, Ref CE1119-02, updated 22 January). The updated report confirms that Roost 2 is in the northwest facing roof of the main building behind the part property with the flat roof and not the barn. In addition to the recorded roosts, several other bats were observed using the site for feeding and foraging.

In the absence of further information and mitigation I cannot agree with the Ecologist's conclusion that the need for European Protected Species Licence has been ruled out. Given the apparent water damage to the plaster board of the section of ceiling below Roost 2 I disagree that the roost will not suffer any impacts or modifications during the proposed internal works and consider that it is likely that works will be undertaken which could cause disturbance to the existing ceiling including insulation or repairs and loss of the access gap and potential roosting features. The Preliminary Roost Assessment did not identify the potential roosting features around Roost 2 and Chase Ecological Consultancy have not provided further external inspections to identify where the access to the roost is located. The Ecologist has not considered the impact of the soil stack proposed to be installed in front of Roost 2.

Roost 2 was previously described as being in the lower part of the roof. It is therefore unclear why the Ecologist proposes all fixing must avoid the enclosed void spaces between the vaulted ceiling and tile coverings, as this suggests that the roost is in the void and not crevices adjacent to the access point. According to the Design & Access Statement the en-suites would be entirely protected by overboarding. The top of the en-suites is proposed to be flat, to allow the attic shape to be visible above the en-suite. Further explanation is needed regarding the statement that roof tiles would be used to supply the ventilation and the ecologist's suggestion that roof tiles will be removed for new ventilation over 2.5m from the access point. This is inconsistent with the proposals the ceiling would be vaulted ceiling would be visible, and duct and vents would not be installed above the ensuite flat ceiling.

The Ecologist recommends but does not appear to have agreed with the applicant that works would be conducted before the end of March 2025. It is not clear that the Ecologist's recommendations for insulation/fixings into the ceiling coverings includes changes to or new insulation between the roof tiles and the current ceilings to comply with building regulations. The Ecologist has not assessed whether the access gap for Roost 2 will be repaired and obstructed. No advice has been given regarding the impact of scaffolding on the roost.



The ecologist has failed to assess the impacts of the lighting proposed or recommend migration for the operational phases of the development. The location of existing inappropriate floodlights and external lighting is not shown on the Emergence Survey Reports plans which appears contrary to the Good Practice Guidelines recommendations.

The updated Emergence Survey Report has again not taken account of the ventilation for the ground floor toilets and first floor kitchen as requested. No new or replacement roosting features have been proposed to maintain and enhance the bat population or off-set the loss of grassland and increased disturbance.



The revised emergence survey protection and avoidance measure don't adequately demonstrate that there would be no requirement for a European protected species mitigation licence. The LPA has a statutory duty under The Conservation of Habitats and Species Regulations 2017 (as amended), to have regard to the requirements of the Habitats Directive before granting planning permission. I am not satisfied that the precautions set out are adequate to ensure that roosts would not be illegally disturbed and that direct and indirect impacts to bats, have been assessed, can be mitigated and compensation secured in accordance with local planning policy and the NPPF.

#### Conditions & Reasons (if required)

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| <b>Date:</b> | 03/02/2025 | <b>Signed:</b> | T Cuss |
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