

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251178
Address:	The Old Vicarage, Church Lane, Grazeley, Wokingham, RG7 1LD.		
Proposal:	Householder application for the proposed erection of 1no. detached two storey outbuilding consisting of garage / workshop with habitable accommodation on first floor plus widening of existing driveway.		
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 reviewed the covering email of 4 September, Ecologists response letter of 20 August 2025, Arboricultural Impact Assessment (Ref GHA/DS/136760:25, July 2025), the tree protection plan Rev C (September 2025) and the revised site plan Dwg KG.005 and Dwg KG.005C showing alternative sites considered.

In response to Conor Watson's letter as previously stated I disagree that the applicant has demonstrated that it is necessary or has justified the need for replacement storage space or a works area. The 232667 application form and Heritage Assessment Design and Access Statement provide evidence that no replacement parking (and I must assume storage is necessary). The application form states that the proposed works will not affect existing car parking arrangements. The Highway Authority made no objection to the removal of the garage as adequate parking is shown on Drawing GZ.006. I do not agree with the Ecologist that the mitigation hierarchy has been properly applied as a sequential process and incorporated into the design.

The applicant has not demonstrated a need for an average of 10 cars and no reference is made to the WBC Parking Standards Study Report. The Ecologist has failed to consider additional parking that is provide on and next to the rear driveway.
1. If a garage is proposed the average number parking spaces needed must be

reduced by the number of cars and vehicles which would be parked in the garage and workshop. According to the Planning Design & Access Statement the proposed layout would provide two parking spaces for larger vehicles and 14 regular car parking spaces. The Ecologist and Agent have not justified the need for a studio, or consider any alternatives. This letter and the application still fail to provide reference to any relevant policy and to demonstrate that there is any overriding or **planning need** for a 2-storey studio or 3-bay garage.

2. The applicant has not considered any options for a single storey garage which would be subservient to the house and in keeping with the outbuilding which was demolished on the north of the garden wall, and the garage and outbuilding approved to be replaced in 232667. Regardless that the main house is not protected by a Conservation Area or Listed Building policy or designation, the issues of subservience and whether a garage is in keeping with its surroundings are not material or relevant to the need to safeguard the nature conservation importance of the orchard. The proposed location of the garage in the orchard east of the second drive does not demonstrate any alternatives that would result in less or no harm has been ruled out.

3. The ecologist does not provide adequate evidence to demonstrate that locating the garage in any other alternative location would cause additional disturbance or detrimental impact to the bat roost. Nor whether the use of, or light for the garage would increase from the garage which was demolished to build the extension. According to site visit photos the trees which previously screened the east elevation of the house have been removed since site ownership changed. The impacts of the roof terrace and roof lights of the extension were never assessed by JWEC, and Ecologist failed to propose any mitigation to avoid and minimize the impacts of light pollution on the Long-eared and Whiskered/Bradts bat roosts and other commuting bats. In the absence of detailed lighting plans and up-to-date bat activity surveys, what the effects (including indirect impacts) of a garage, workshop and studio and the loss of foraging on bats, birds and other wildlife will be, are unclear. I am not satisfied that the application demonstrates that the current development proposals would have no detrimental impact on bats and would secure any enhancement.

4. The application does not provide any photos or visuals of the hedge or justify why a location to the north of the house should be ruled out. Two or three established hedges have previously been removed without a hedgerow regulations application, including an east-west hedgerow north of the house. If a garage was located on either the footprint of the outbuilding which was demolished northeast of the location Option 1, or between the 2023 extension and the swimming pool the established hedgerow would not need to be removed.

If a planning need for a garage or additional parking could be justified the alternative of a single storey building and/or flat roof would ensure that light would not be blocked. No details visual have been submitted confirm if the land to the north is level or sits lower than the terrace and new extension. Blocking of light is however not a material consideration for policy CP3 and CP7. The garage and outbuilding which the new extension replaced were single-storey and I must disagree that any need for a 2-storey new building has been demonstrated as required by WBC Local Plan and national planning policy.



While the width of the additional drive in front of the proposed garage has been narrowed, I must disagree that the alteration has mimized the loss of priority Traditional Orchard habitat. Retention of fruit trees and provision of new trees does not compensate or mitigate for the loss of habitat and the opportunity to restore the over-intensively mown grassland. The mitigation and compensation suggested by the Arboricultural Impact Assessment Drawing Rev C, Site Plan and the Ecologist's letter, GCN Statement and the applicant's covering email does not mitigate for the loss of priority Traditional Orchard habitat.

I understand that the Ecologist's letter confirms that the area impacted by the proposals is Traditional Orchard habitat of principal importance. The letter does not however confirm when management of the orchard has intensified or what the previous habitat condition was. I note the letter does not provide a comprehensive ecological appraisal in line with CIEEM guidelines and BS42020.

According to LPA planning history construction of the new pool house, orangery, front patio, rear terrace front and rear drives, were undertaken without planning approval. The Volume Calculations provided therefore appear incorrect or incomplete and cumulative impacts of habitat clearance are still not taken into account by the Ecologist. The 23266 HDAS states that *"the abundance of trees and greenery in the garden also provide a level of privacy to the rear of the house. This will be retained as part of the proposed works"*. The report failed to refer to the previous hedgerow and shrub removal which were undertaken to widen the rear drive which provides the access to the garage.

I am not satisfied that the cumulative loss of hedgerows, tree felling and shrub clearance and previous widening of both drives and introduction of non-native landscaping have not been assessed by the Ecologist. The Ecologist and Architect have failed to propose any habitat creation, restoration of grassland or off-site compensation which might be secured by planning obligation to maintain the retained area of the orchard which is not impacted by pool house or the proposed drive and studio/garage.

To comply with NPPF paragraph 187 the decisions should ensure proposed development contributes to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs. NPPF 193 states that when determining planning applications, local planning authorities should apply the following principles: *"development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists."*

If the proposals were otherwise acceptable, the inclusion of an integral Habitat bat box or bat tube or the creation of a bat loft or void (in preference to an external Beaumaris Woodstone type bat box) would be in accordance with local policy, and the NPPF. However, the Ecologist and the Architect have failed to provide an external lighting scheme or wildlife-friendly lighting proposals to ensure that introduction of built development and significant increase in vehicle movements on the rear driveway would not increase light pollution and negatively impact bats and other wildlife contrary to NPPF paragraph 198 and Local Plan policy.

Summary

I maintain my objection to the development proposals. In the absence of clear demonstration that there is an imperative and overriding need for 4 additional enclosed parking spaces, that a studio cannot be accommodated anywhere else within the existing building, and because there is no public benefit provided, the loss

or impacts on wildlife cannot be justified. A desire for further parking spaces above the existing generous provision, does not outweigh the LPAs obligation and the policy requirement to safeguard priority habitat. Compensation measures have not been proposed that would off-set the habitat loss, and mitigation measures proposed do not avoid and reduce all direct and indirect impacts or ensure enhancement in either the red or blueline land.

I object to the development proposal and recommend that the application should be refused on grounds of direct loss of Traditional Orchard priority biodiversity habitat, and the failure to satisfy the requirements of Local Plan policies CP3, CP7, MDD TB23 or the NPPF Section 15.

WBC Ecology will be happy to recommend sources of advice and potential funding for restoration of the orchard and the unimproved or semi-improved MG5 neutral grassland to the east.

Conditions & Reasons (if required)

Please advise if the application is subsequently approved and I would like the opportunity to recommend conditions to ensure no net loss of biodiversity, retention and protection of habitats and wildlife during construction and obligations to secure appropriate compensation.

Date:	09/09/2025	Signed:	T Cuss
--------------	------------	----------------	--------