

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	250829 & 250841
Address:	Springfields, Hatch Gate Lane, Wargrave, Wokingham, RG10 8QD.		
Proposal:	Householder application for proposed erection of a two-storey side/rear extension, modifications to the roof, removal of a chimney and existing single storey elements and changes to fenestration, and demolition of existing outbuildings and structures.		
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 the Springfield House Preliminary Ecological Appraisal (Arbtech, December 2024), Barn Ecological Mitigation, Enhancement and Management Plan (Arbtech, Ref 241686, January 2025), Bat Emergence and Re-Entry Surveys (BERS) (Arbtech, July 2024), Springfield Barn Preliminary Roost Assessment (Arbtech, May 2024), and Springfields Landscape Strategy (Ref SFH.LANDSCAPE.01, March 2025). I have also reviewed the Design, Access and Heritage Statement (Magrun March 2025), Arboricultural Survey to BS5837:2012 (Arbtech January 2025), Arboricultural Site Proposals Plan (AIA01), Sustainability Statement and the submitted plans and elevations. I have also reviewed the site and immediate local planning history.

All British species of bats and their roosts are fully protected by The Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). This legislation makes it a criminal offence to deliberately or recklessly to destroy, damage or to obstruct access to their roosts, or to disturb, kill or injure, capture or disturb bats, without first having obtained the relevant licence from Natural 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.

The Springfield Barn Preliminary Roost Assessment and Bat Emergence and Re-Entry Surveys assessed the barn as having high roost potential. One Brown long-eared bat was seen during the PRA and further emergence surveys identified Common pipistrelle and Brown long-eared day roosts and a Soprano pipistrelle maternity roost. Prior to implementation of 241686 a copy of the European Protected Species Licence which was issued to the Owner should have been submitted to the LPA to discharge 241686 conditions 5.

The Preliminary Ecological Appraisal (Arbtech 17 December 2024) prepared to support the current application states: *"B3 has not been surveyed, impacts cannot be foreseen at this stage. These will be determined by the PRA and, if required, any subsequent surveys"*. The Ecologist states: *"As roost assessments have only been conducted on B1 and B2, B3 will require a preliminary roost assessment report in order to identify if there are any potential roosting features present and therefore if further surveys are required"*.



The Preliminary Roost Assessment (Arbtech, May 2024) did not include internal or external inspections of outbuilding B3. In line with Arbtech's advice the application must not be approved until bat surveys of B3 and a mitigation strategy have been submitted. Government 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. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted."*

The LPA has statutory duties under The Habitat Regulations. WBC must be satisfied that a licence for development works affecting bats is not unlikely to be granted by Natural England. Therefore, in line with Local Plan policies CP3 and CP7, I cannot recommend that the application is approved and a European Protected Species Licence condition can be imposed until the presence of bats in the outbuilding has been ruled out.

The PEA report proposes biodiversity enhancements including incorporation of three bat boxes that will provide additional roosting habitat for bats. They propose to integrate into suitable bat boxes into the new building (e.g. Habibat Bat Box, Ibstock Enclosed Bat Box or similar alternative) on the south or southwestern elevation.

I note the proposal to demolish using soft strip techniques. To provide opportunities and mitigate for bats the reuse of existing roof tiles and roof timbers should be secured by planning condition. Use of treated new timbers must take account of future potential use of roof voids and crevices as resting places by bats. When the loss of B3 and impacts of landscaping have been considered, the above enhancements and implementation in accordance with the mitigation measures set out in the PEA should be secured by planning condition.

Summary

PEA and Emergence surveys fail to rule out or confirm evidence of any roosting bats in the outbuilding. As advised by Arbtech's ecologist the outbuilding has bat roost potential and further surveys are needed. The application must not be approved until a roost assessment and where necessary bat emergence surveys and method statements have been submitted.

When the impact of the demolition of the outbuildings and clearance and landscaping works have been assessed, conditions are likely to need to include (but may not be limited) to those recommended below.

Conditions & Reasons (if required)

Awaiting emergence survey results of outbuilding B3.

Condition: No operations shall commence on site in connection (including any tree felling, tree pruning, demolition works, site set-up or any other operation until a European Protected Species Mitigation Licence for all development works affecting the barn has been obtained from Natural England, and a copy has been submitted to and approved in Public. Should the applicant conclude that a licence for development works affecting bats is not required the applicant is to submit a report to the Local Planning Authority detailing the reasons for this assessment and this report is to be approved in writing by the Local Planning Authority.

Reason: To ensure protected species are not adversely affected by the development in accordance with policy CP7 of the Core Strategy and TB23 of the MDD

Condition: Unless otherwise previously agreed in writing by the council works are to be carried out in full accordance with the recommendations and biodiversity enhancements given in pages 8 to 14 of the submitted Preliminary Ecological Appraisal (Arbtech, December 2024).

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: Prior to commencement of the development, a scheme of native and wildlife friendly landscaping and biodiversity enhancements shall be submitted to and approved in writing by the council. The biodiversity enhancement scheme will accord with the detail of the proposals and recommendations outlined in the Preliminary Ecological Appraisal (Arbtech, December 2024). The scheme shall include at least 3 integral Habitat, Istock Enclosed Bat Box or similar suitable alternatives in addition to the following enhancements for birds:

- Schwegler No 17 Swift Nest Box
- Schwegler 1SP Sparrow Terrace

- Schwegler 1B Nest Boxes (trees)
- Schwegler Robin Boxes (trees)

To benefit hedgehogs the habitat creation and enhancement opportunities will also include:

- Planting of fruit bearing trees and species-rich grassland.
- Creation of brash piles or installation of hedgehog houses in shady areas.
- Installation of hedgehog gaps.

The biodiversity enhancements shall thereafter be installed as approved.

Reason: To ensure that wildlife is maintained and incorporate biodiversity in and around developments in accordance with paragraph 187 of the NPPF. Relevant policies Local Plan Core Strategy policy CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Unless otherwise previously agreed in writing by the council works are to be carried out in full accordance with the recommendations and biodiversity enhancements given in Section 4 Table 2 of the submitted Barn Bat Ecological Mitigation, Enhancement and Management Plan (Arbtech, Ref 241686, January 2025).

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: Unless otherwise previously agreed in writing by the council works are to be carried out in full accordance with the recommendations and biodiversity enhancements provided in the submitted Springfields Landscape Strategy (March 2025).

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:

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 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: Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policies TB21 and TB23.

Condition: Prior to occupation, a side-wide lighting design strategy for biodiversity or areas to be lit 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, birds, and amphibians 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.

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

Date:	16/06/25	Signed:	T Cuss
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