

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	243031
Address:	27 The Square, Spencers Wood, Wokingham, RG7 1BS.		
Proposal:	Householder application for the proposed erection of a single storey front/side and rear extensions following demolition of the existing conservatory.		
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 Preliminary Bat Roost Assessment (GS Ecology, Ref ECO3618, 31 October 2024) and reviewed the application form, plans and elevations submitted in support of the application.

Preliminary Bat Roost Assessment (PBRA) section 3.14 lists a number of features potentially suitable for use by roosting bats including F (main roof). No bats or signs of bats were found during the survey, Features A to C will be unaffected. However, the Ecologist incorrectly states Features D, E and F will be unaffected.

Feature D is hole in the barge board below slates at north eastern corner of secondary pitched roof, perpendicular to the main pitch. This is a contained bird nesting material which blocked access further into the fabric of the building, rendering the area unsuitable for use by roosting bats. Gaps under end tiles on the eastern lean-to Feature E were blocked with dense cobwebs and other debris. The elevated inspections and photographs in appendix 1 do not include inspection of Feature F from a ladder or confirm inspection with an endoscope.

The Proposed Roof Plan 2 (9 December 2024), the revised Rear Elevation which submitted on 01/12/2024 and Proposed L Side Elevation Rev 3 (submitted 9/12/24) contradict the Ecologist's assessment in paragraphs 1.5 and 5.2. Comparing the existing rear elevation, the rear elevation in the PBRA and the current designs, it is clear that works are proposed to the roof including removal of tiles, impacts on

trusses and soffits. The Proposed L Side Elevation Rev 3 and Proposed Roof Plan 2 show the rear extension roof will be stripped and demolished. Is not possible to rule out direct or indirect impacts to bats or roosts and determine the application until more survey information has been provided.



The PBRA assessed the habitats surrounding the site to be of 'moderate' to 'high' suitability and within the site as 'moderate' suitability for commuting and foraging bats. The application form inaccurately states there are no trees or hedged on the property or on adjoining properties and no hedges or trees need to be pruned or removed to carry out the proposal. The PBRA fails to assess the impact of the habitat loss from creation of parking and porcelain tile patio/hardstanding on wildlife and bats and the net loss of biodiversity habitat as shown in the Proposed Driveway/Patio plan.

Core Strategy policy CP3 d) states that planning permission will be granted for proposals that maintain or enhance the ability of the site to support fauna and flora including protected species. Development proposals will be required to demonstrate how they have responded to the above criteria through the submission of ... clear and informative plans, elevation and streetscenes. According to CP7 development will be only permitted mitigation measures can be put in place to prevent damaging impacts or appropriate compensation measures are provided to offset the losses. While the application was submitted before the publication of the NPPF in December paragraph 187 should be considered by the LPA. It states that planning decisions should contribute to and enhance the natural and local environment by d) 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. According to national and local policy existing trees, shrubs and hedges should be retained and protected and loss and negative impact mitigated, and unavoidable loss compensated.

Managing Development Delivery policy TB23 states planning permission will only be granted where they comply with policy CP7 and also demonstrate how they provide opportunities to incorporate new biodiversity features or enhance existing; and c) Ensure that all existing and new developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors, which shall be integrated and linked to the wider green infrastructure network.

Removal and failure to protect boundary hedges and trees which provide foraging and commuting for bats and support other wildlife should be assessed by the Ecologist, plans amended, and compensation proposed to mitigate impacts. 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"*.

Summary

In the absence of an Arboricultural Impact Assessment, revision of the parking and hard landscaping proposals, assessment of the impacts of main roof potential roosting features and mitigation, biodiversity-friendly lighting, compensation and enhancement proposals, the application should not be approved. I would be happy to comment on an AIA and a revised PBRA and landscaping proposals.



Conditions & Reasons (if required)			
Awaiting submission of an Arboricultural Impact Assessment, revised Preliminary Bat Roost Assessment and layout to assess, reduce impact on mitigate, and compensate for loss of biodiversity and maintain and enhance protected species.			
Date:	14/01/25	Signed:	T Cuss