

MEMORANDUM

From:	Tina Cuss		
Service	WBC Ecology Householder	App No:	242052
Address:	Misting Meadows, Park Lane, Finchampstead, Wokingham, RG40 4PT.		
Proposal:	Householder application for the proposed erection of three outbuildings forming residential annexe, garden room, and garage & store, following demolition of existing outbuilding and removal of existing ancillary mobile home.		
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 Planning Statement (ET Planning, August 2024), application form, CIL forms and plans submitted in support of the application. There is no Arboricultural Impact Assessment, no Preliminary Bat Roost Assessment, Biodiversity Survey, Biodiversity Net Gain Assessment or Statutory Metric submitted with the application.

I am unclear why the applicant has completed a householder application form and why, in line with the invalid letter sent to the applicant on 16 August 2024, this is not a full planning application.

The Planning Statement identifies that the whole application site is subject to an area Tree Preservation Order. However, in terms of loss or degradation of biodiversity habitat and assessment against the requirements of Local Plan policies I disagree with the Planning Consultants statement in PS paragraph 5.33 that with *"this oak removed there would be no protected trees within the vicinity of the proposed development"*. The Planning Statement makes no reference to the clearance of trees which has been undertaken either since TPO-1609-2017 was confirmed of the application site was sold in January 2024. The site is protected TPO-1609-2017 which protects all the trees in woodland area W1 and area A1 which have been partially cleared, apparently in recent months. The Thames Valley

Records Centre has identified that the habitats on the western and northern site as Seminal Broadleaved Woodland which is a priority biodiversity habitat which is protected by the NPPF and Local Plan policies. The site is in a Great Crested Newt District Licence Red High Risk Zone which is the most suitable habitat GCN. As no reference is made to the suitability of terrestrial habitat and the proximity to ponds or the legal protection which GCN receive I don't consider that the GCN Statement is comprehensive.

If the application should be made for a full planning permission, I would disagree that a Biodiversity Gain Condition would not apply. Any full application would have to be supported by a Statutory Metric and Degradation Statement providing details of when biodiversity habitats have been cleared from the site. According to the Local Validation List

Bat Surveys must be submitted with householder or full planning applications if the site is within suitable bat roosting area and development includes works to roof or demolition. I am not satisfied with the Applicant's assessment that no bat survey is required for demolition of the outbuilding, and I consider the building has potential roosting features for crevice dwelling bats. A Preliminary Roost Bat Assessment as well as any further surveys recommended by the licensed bat ecologist must be submitted in order to validate and favourably determine the application.

According to CP3, planning permission will be granted for proposals that c) Have no detrimental impact upon important ecological, heritage landscape (including river valley) or geological features or water courses. And (d) 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 Design and Access Statements, clear and informative plans, elevation and streetscenes. CP7 states that development which may harm habitats or, species of principle importance veteran trees or features of the landscape that are of major importance for wild flora and fauna whether directly or indirectly, will be only permitted if mitigation measures can be put in place to prevent damaging impacts. TB states Planning permission for development proposals will only be granted where they comply with CP7 and also demonstrate how they provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing

Summary

In the absence of any Ecological Assessment or survey the application fails to provide information to assess the impact of the proposals and clearance undertake prior to the application on priority habitats and protected species. The development would result in a direct net loss of biodiversity habitat which has good potential to support notable and protected species. The application is contrary to the requirements of CP1, CP3, CP7. In the absence of measures to protect, maintain and compensate habitat loss and enhancements for biodiversity and wildlife the proposals are contrary to CP7 and TB23 and should not be approved.

If an Ecological Impact Assessment with details of the clearance or degradation of the site and detailed, badger, reptile, building and tree bat roost assessment and habitat survey are not submitted, the application may be refused on grounds of lack

of ecological information, loss of biodiversity habitat which are contrary to policies CP1, CP3 and CP7 of the Core Strategy and MDD policy TB23

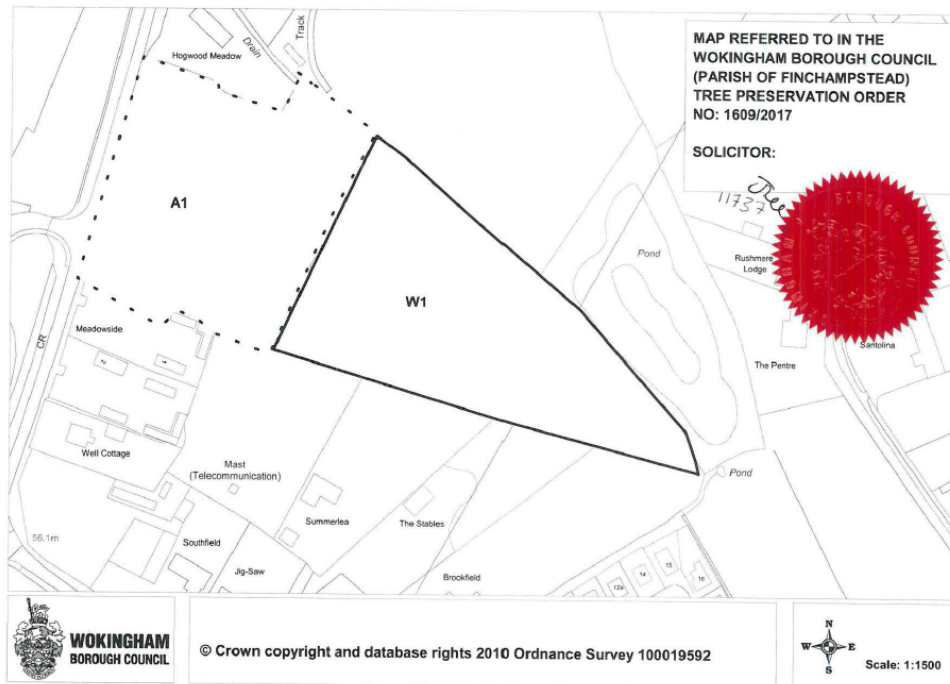
Conditions & Reasons (if required)

N/A

If the full application is eligible a Biodiversity Net Gain Condition must be secured

Date:

Signed:



SCHEDULE

Specification of trees

Trees specified individually

(encircled in black on the map)

Reference on map	Description	Situation
NONE		

Trees specified by reference to an area

(within a dotted black line on the map)

Reference on map	Description	Situation
A1	All trees of all species located within the area A1.	Located on land at Misting Meadows, Park Lane, Finchampstead, Wokingham, Berkshire, RG40 4PT

Groups of trees

(within a broken black line on the map)

Reference on map	Description	Situation
NONE		

Woodlands

(within a continuous black line on the map)

Reference on map	Description	Situation
W1	All trees of all species located within the woodland W1.	Located on land at Misting Meadows, Park Lane, Finchampstead, Wokingham, Berkshire, RG40 4PT