
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252259
Address:	149 Victoria Road, Wargrave, Wokingham, RG10 8AG.		
Proposal:	Full application for the proposed erection of 1no dwelling, detached double garage with associated landscaping, parking, EV charging point, cycle and bin storage following demolition of existing dwelling.		
Type of Development:	Minor Dwellings (1-9)		
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 Ecological Appraisal and Roost Assessment (Arbtech, 11 August 2025), Planning Statement (Atelier T&B, Ref AT/25/078-PS), Design & Access Statement (Ref At/25/078-D and Surface Water Drainage Statement (Ref AT/25/078-D) and reviewed the plans and elevations submitted in support of the application.

The external inspection carried out on 11 August 2025 states that the hanging tile had been removed prior to the survey. The Ecologist does not confirm that a detailed inspection of the battens which the tiles were attached has been carried or acknowledge that there were previously a number of slipped tile which have to potential to provide roosts for crevice-dwelling bats. I do not agree with the Ecologist that the house B1 and garden would have had negligible habitat value for bats prior to vegetation clearance, loss of potential roosting features and degradation of the site. I note the timber shown stacked in front of the property in figure 1.

The Ecologist states that suggested biodiversity enhancements for bats are dependent on the outcome of further surveys, however they have not recommended completion of further surveys. They do advise that the recently cleared bramble offers nesting opportunities and nest-building resources for birds. The Ecologist has assessed that the proposed development could result in the destruction or disturbance and subsequent abandonment of active bird nests.



Figure 1: Front and side elevation of B1



Unvegetated garden Photograph



Appendix 1: PRA/Habitat map



I support the suggested biodiversity enhancements. If the application is approved all of the enhancements suggested and mitigation measures recommended must be secured by planning condition in order to compensate for the degradation and site clearance and impact of development proposals in line with NPPF 187 and Local Plan policies CP3, CP7 and MDD TB23. Ecological mitigation and enhancement must include installation of a minimum of 3 integral bird boxes in the new dwelling including Swift nest box and Sparrow terrace as well as tree bird boxes. The habitat creation and enhancement suggested will compensate for the impact of site clearance on hedgehog and other mammals and should include planting of fruit-bearing trees and species rich grassland, brash piles and 15x15cm hedgehog-gaps in all proposed boundary fencing/walls.

WBC Local Plan policy CP3 states that planning permission will be granted for proposals that 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”.*

I am not satisfied that the development plans and Design & Access Statement demonstrates that the ability of the site to support wildlife will be maintained or enhanced. The Design & Access Strategy Landscape Strategy Section 9 states that *“Biodiversity is central to the landscape strategy. The site has been designed to support and encourage wildlife, integrating ecological features throughout the garden, such as strategically places logs, timber piles, and buried timber to offer shelter for invertebrates and small mammals” ... “These measures establish a rich and varied habitat that actively contributes to the local ecological fabric, ensuring that the site supports wildlife while also enhancing the sensory and experiential quality of outdoor spaces”.*

The Architect has failed to take account of the degradation of the site before the application was submitted, and the Ecologist has not quantified the net loss and impact on biodiversity habitat. In the absence of detailed landscaping and plans for ecological enhancements including those suggested by the Ecologist it is not currently possible to conclude that these measures can all be provided and retained in the long-term as stated by the Architect. According to the Proposed Site Plan the landscaping proposed is limited to only the green roof proposals and no replacement tree and shrub planting or retention of bramble scrub biodiversity habitat is proposed.



While the PEA/PRA states that a low impact lighting strategy will be adopted during post-development (occupation phase), no details of external lighting and constraints are considered in the Design & Access Statement. The impact of upward light spread and light pollution on the habitat created on the green roof is not considered and no specific mitigation measure to install filters or blind have been recommended. An external lighting condition must therefore be if the application is approved to minimize the impact of light pollution on bird and nocturnal species including bats and invertebrates.

Summary

There are no ecological objections provided that biodiversity compensation and protected species enhancement, landscaping, and lighting conditions are included in any approval and implementation in line with the recommendations and suggestions in the PEA/PRA are secured.

Conditions & Reasons (if required)

Condition: Works are to be carried out in full accordance with all of the mitigation recommendations and suggestion for biodiversity enhancements given in Preliminary Ecological Appraisal and Roost Assessment (Arbtech, 11 August 2025) and compensation proposed in outline in section 9 of the Design & Access Statement (Atelier T&B)

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 the occupation of the development, details of biodiversity enhancements, to include bat tubes and bird boxes around the new buildings and native and wildlife friendly landscaping, shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved. Within one month of substantial completion a short closing-out report demonstrating that the ecological mitigation and enhancement measures have been implemented to the satisfaction of the Owner's Ecologist is to be issued to the council.

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

Condition: No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the written approval of the local planning authority. If within a period of five years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted at the same place, unless the local planning authority gives its written consent to any variation

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

Condition: Prior to commencement of development a lighting strategy for biodiversity for all and any *areas to be lit* designed in accordance with best practice including [Bats and Artificial Lighting at Night' 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 invertebrates* 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 for foraging and commuting; 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 protect biodiversity. Relevant policy: NPPF paragraph 198 and Section 15 (Conserving and Enhancing the Natural Environment), Local Plan policies CP1, CP3 CP7 and MDD TB23*

Despite ecological surveys being undertaken which suggest that protected species are not using the application site, bats are mobile creatures, and it is possible that protected species may be encountered once works commence. I recommend the following informative should be appended to any such consent:

Informative: Bats are a protected species under the Conservation of Habitats and Species Regulations 2017 (as amended). Should any bats or evidence of bats be found prior to or during the development, all works must stop immediately and an ecological consultant contacted for further advice before works can proceed. All contractors working on site should be made aware of the advice and provided with the contact details of a relevant ecological consultant.

Date:	18/11/25	Signed:	T Cuss
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