

Memo

To: Alison Amoah

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 31 October 2024

Re: Planning application ref: PL/24/0718

Address: 2 Northcourt Avenue Reading RG2 7HA

Description: Extension at ground, first and second floors to the side and above a vacant commercial unit to create a seven bedroom, seven person large Sui Generis HMO

The application site is a building located in a residential area at the junction of Christchurch Road and Northcourt Avenue. The proposals include external alterations to the building to create a seven bedroom HMO. These alterations include the replacement of a single storey extension with a large two storey extension.

Since the development area consists entirely of hardstanding and no habitats will be affected, the application is not subject to biodiversity net gain requirements

Bats

There are a number of records of roosting bats in the vicinity with the nearest recorded roost being approximately 100m from the application site. The surrounding habitat is of good suitability for use by commuting and foraging bats including nearby open grounds of Reading University to the east and Cintra Park to the west. The proposals will result in the loss of features potentially suitable for use by roosting bats, such as raised, loose or missing roof tiles which are clearly seen on photos of the existing extension.

As such, there is a risk that the proposals may impact upon roosting bats and a bat survey report will need to be provided before this application can be determined. Further details are given below.

Legislation

All species of bats receive protection under UK law and it is a criminal offence under the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 (The Habitat Regulations), deliberately or recklessly to destroy or damage their roosts, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from the Statutory Nature Conservation Organisation (the SNCO - Natural England in England).

Planning policy

Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (this document was not

revoked by the National Planning Policy Framework) 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.”

Survey requirements

A presence / absence bat survey is normally undertaken in two stages, firstly a preliminary roost assessment, whereby the inside and outside of the building is surveyed for bats and signs of bats. This survey can be undertaken at any time of year.

If bats were found or features within the building had the potential to support roosting bats and these would be affected by the proposals, further dusk emergence surveys during the bat active season (i.e. between May and the end of August) would need to be carried out. The applicant would then need to submit the results of the survey(s), along with any associated mitigation strategy, with their planning application.

Surveys should be carried out by suitably experienced ecologists who are a member of a professional organisation such as the Chartered Institute of Ecology and Environmental Management and / or are licensed or accredited by Natural England to survey bats.

Summary

The building may host roosting bats and to confirm whether this is the case, and if so how bats will be affected by the proposals, a bat survey will need to be carried out. Alternatively, the applicant may wish to provide photographs that we will then be able to review for any potential features suitable for use by roosting bats. Such evidence will need to be provided prior to determination of the application or the application would need to be refused on the grounds that insufficient evidence had been provided to determine the likely impacts of the proposals on bats (which are a protected species and a material consideration in the planning process).