

Memo

To: Marcie Rejwerska

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 3 January 2024

Re: Application ref: 231605

Address: 17 Craven Road Reading RG1 5LE

Description: Replace front boundary, rear garden landscaping, repairs to greenhouse, garage outbuilding and rear boundary brick walls

The application is for a number of alterations to land and repairs to buildings, within the curtilage of 17 Craven Road. The application description is similar to that for pre app 221207 for which we requested an ecological survey of the site prior to submission of a full application as our records showed a badger sett located within the garden of 17 Craven Road.

The site originally comprised a number of trees/overgrown areas which may be used by a number of protected and priority species including nesting birds, hedgehog, badger and reptiles. Photos in the DAS show some of the site has now been cleared however, if any trees are to be removed (the arboricultural report states that the tree at the front of the site will need to be removed) there could also be a risk that the works may impact upon roosting bats. Furthermore, we have records of roosting bats in neighbouring properties and photos of the garage within the DAS show a number of potential roosting features which could be used by bats.

As such, there would be a risk that the repairs to the garage and the works on the garden would impact upon protected species and an ecological appraisal (comprising an extended Phase 1 Habitat and Species Scoping Survey, and any phase 2 surveys) would need to be submitted with any application.

Survey requirements

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 protected species.

Extended phase 1 habitat & protected species scoping survey

An Extended Phase 1 Habitat Survey is a standardised technique for environmental audit and involves classifying and if required mapping habitats on and adjacent to the application site. The survey is then 'extended' and any features or habitats that are likely to be of importance for notable or protected species, and or prove to be a constraint to development are investigated further and described.

Phase 2 ecology surveys

If the surveys show that the site contains habitats suitable for protected species further surveys for species such as badgers and bats may need to be carried out

Bat survey

A presence / absence bat survey is normally undertaken in two stages, firstly a preliminary roost assessment (or bat roost potential survey), whereby the inside and outside (from ground level) of the building and any trees to be removed is thoroughly searched for bats and signs of bats, this survey can be undertaken at any time of year. If no signs of bats and few features such as cracks and crevices in which bats could roost are found and the building and/or trees have negligible potential to host roosting bats then further surveys will not be required. However, if bats are found or the buildings and/or trees have features suitable for use by roosting bats, further emergence and or dawn surveys during the bat active season (i.e. between May and the end of August/ sub optimally until mid-October) may need to be carried out to confirm the presence or absence of bats and, if bats are present, to characterise the roost and establish mitigation requirements.

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 has not been 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.”

In this case, since the extent to which protected species will be affected by the proposals has not been established, and there appear to be no “exceptional circumstances”, the application would not be in accordance with the above planning policy.

Summary

The application site may contain habitats that are suitable for use by protected species and surveys to confirm their presence or absence will need to be undertaken. These surveys and any mitigation plan will need to be submitted prior to the determination of the application, or the application should be refused on the grounds that insufficient information has been provided for the council to determine the likely impact of the proposals upon protected species. The applicant should be aware that some ecology surveys are seasonal and should ensure that factor this into their timeframes for the project.