

Memo

To: Jonathan Markwell

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 18 May 2026

Re: Planning application ref: PL/26/0352

Address: WARREN CREEK, THE WARREN, CAVERSHAM, READING, RG4 7TQ

Description: Discharge of conditions 3 (materials), 4 (scheme to mitigate flood risk impact), 6 (schedule for removal of existing structures), 7 (maintenance of the flood voids), 9 (sustainable drainage strategy), 11 (demolition and construction method statement), 16 (programme of archaeological work), 17 (hard and soft landscaping), 18 (arboricultural method statement and tree protection plan), 19 (construction environmental management plan), 20 (external lighting scheme), 21 (noise assessment of the proposed mechanical plant) and 22 (privacy measures) of planning permission PL/24/1614, as granted on 12/11/2025.

The application is for discharge of conditions 3 (materials), 4 (scheme to mitigate flood risk impact), 6 (schedule for removal of existing structures), 7 (maintenance of the flood voids), 9 (sustainable drainage strategy), 11 (demolition and construction method statement), 16 (programme of archaeological work), 17 (hard and soft landscaping), 18 (arboricultural method statement and tree protection plan), 19 (construction environmental management plan), 20 (external lighting scheme), 21 (noise assessment of the proposed mechanical plant) and 22 (privacy measures) of planning permission PL/24/1614 [*Demolition of existing dwelling and outbuildings and the erection of a 4-bed detached dwelling (amended description).*]

Comments on Condition 11, 17, 19, and 20 are provided below.

Condition 17

The applicant has submitted an updated Proposed Soft and Hard Landscaping Plan (Shaun Tanner ref 3863/301, Jan 2026, Rev B) which appears to have addressed our previous comments and there would be no ecological objections to this condition being discharged.

Condition 19

The applicant has submitted an updated document (CEMP, Construction Environmental Management Plan vo.2 still dated 15 Dec 2025, no author)

This revised document is much improved and addresses several of our previous concerns particularly in relation to the definition of biodiversity protection zones, pollution prevention and now recognises the Thames as a protected area.

However, there are still a few outstanding issues – notably regarding inconsistencies between the demolition methodology and relating to bats and the use of advisory wording for mitigation measures

- (a) The document states that “ *this plan must be dynamic*” While this may be understandable from an operational point of view, we require a fixed and approved document. Otherwise the applicant could incorporate changes to the document by inferring these changes are part of the dynamic nature of the document. Our advice is that any amendments to the CEMP must first be agreed in writing with the LPA.
- (b) Demolition of the existing building is still not clear. For reference the bat survey report stated “*Other measures will include a ‘toolbox talk’ to contractors about bats and what to do if one is unexpectedly encountered, a pre-works inspection of the roof void, supervision of any destructive roof works, the latter undertaken by hand. If a bat is discovered all work will stop and a suitable licence from Natural England will be applied for and once granted, work can recommence. It should be noted that there will be no timing constraints, and an ecologist will be present at all key stages to ensure the replacement roosting provision is correctly installed.*” However the CEMP uses advisory wording such as
 - (i) “A Toolbox Talk **should** inform contractors about bats “
 - (ii) There **should** be a pre-works inspection of the roof void before roof deconstruction begins

This is advisory wording rather than mandatory and therefore means that the bat mitigation measures cannot be enforced

The CEMP also states that “*an ecologist will be present at all key stages to ensure the replacement roosting provision is correctly installed.*” These key stages are not defined and more importantly there is no mention of the supervision of the destructive roof works as required and detailed in the bat survey report.

Condition 11

This is a method statement that details the demolition and construction methodology across the whole site.

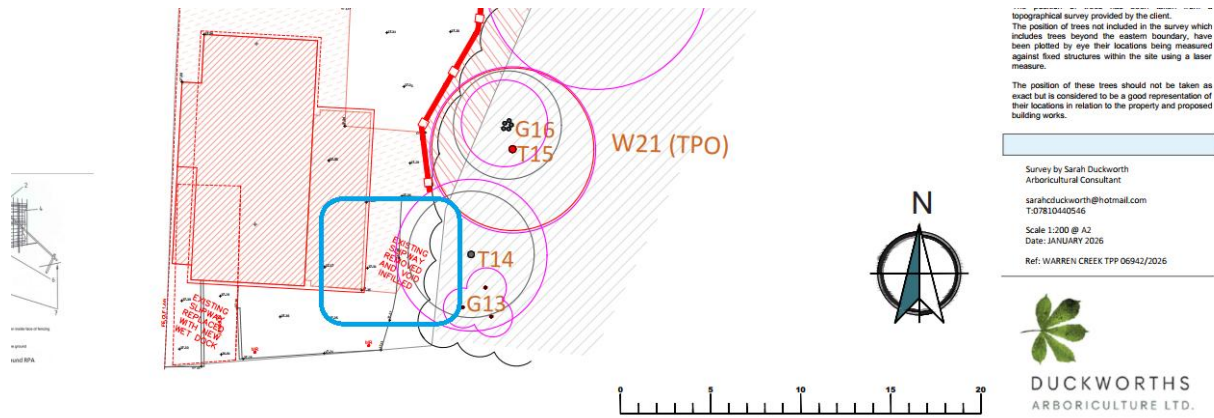
Generally it is not clear whether this document is also applicable to the main house/bungalow as it only refers to garages and outbuildings.

Furthermore, the document only refers to “demolition by hand” or “soft strip”. Whilst we would expect to see the demolition methodology to be fully described in the CEMP (Biodiversity), the statement should demonstrate how the measures within the CEMP- biodiversity will be implemented on the site. It should make some reference to the CEMP biodiversity, as well as providing confirmation that the CEMP Biodiversity will be followed - currently it does not.

In addition, a summary version of the measures required for the bungalow regarding bat mitigation should be included. This doesn’t need to be detailed but will need to confirm the various key points referred to in the CEMP Biodiversity – ie a pre works bat check, the soft strip, any timing constraints and the supervision by an ecologist.

Other Issues – could be Condition 11 and 19 or both

There is no reference in this document to the methodology involved for the infilling of the slipway – shown in blue box below:



Clarity is required on whether this is still proposed and if so what measures are required to protect the Thames in this location

Condition 20 reads:

A small number of images showing indicative light types have been submitted within the updated Proposed Soft and Hard Landscaping Plan.

However, this information does not provide the level of detail required by the condition which requires: *“a report detailing the external lighting scheme and how this will not a) adversely impact upon wildlife and b) for the protection of amenity of occupiers and neighbours,...”*

The report should include layout plans, lighting specifications, beam orientation, measures to avoid glare, and isolux contour maps down to a 0.5 lux level demonstrating predicted light spillage levels across the site. This is of particular importance given the sites location adjacent to the River Thames and surrounding trees and other vegetation which may be used by nocturnal wildlife, including bats.

As this information has not been provided, the LPA is unable to adequately assess the impact of the proposed lighting scheme and condition 20 should not be discharged until the required information has been submitted.

Summary

In summary more details are required addressing the above points before conditions 11 19 and 20 can be discharged.

Condition 17 can now be discharged from an ecology point of view.

All other conditions (3, 4, 6, 7, 9, 16, 18, 21 and 22) are not directly related to ecology and there would be no objections to these conditions being discharged