

Ecology Technical Note



**Tyler
Grange**

**Land between Lodge Road
and Tape Lane, Hurst
3rd June 2025**

TG Report No. 16452_R04_MJ

Project No:	Report No.	Date	Revision
16452	R04a	04 June 2025	-
Admin QA	Author	Checked	Approved
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Section 1: Introduction

Introduction and Planning Context

- 1.1. This report has been prepared by Tyler Grange Group Limited (TG) on behalf of Mac Mic Strategic Land Limited (Mac Mic). This report sets out supporting ecological information in relation to an Outline planning application (reference: 242067) submitted to Wokingham Borough Council (WBC). The application is for land between Lodge Road and Tape Lane, Hurst, RG10 0EG, centred on OS grid reference SU 79477 73695, and the extent is shown on the Site Location Plan in **Appendix 1**. This land is herein referred to as 'the site'.
- 1.2. The Outline planning application (reference: 242067) is herein referred to as 'the application'. The application is for *"the proposed erection of up to 99 no. dwellings, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Road and Tape Lane with required improvements. (All matters reserved except for means of access.)"*
- 1.3. The application was received on the 12th August 2024, and was refused on 29th November 2024. Prior to the refusal, an ecology response was received on the 30th August 2024, comprising a Memorandum and comments within the submitted Biodiversity Net Gain (BNG) metric. However it should be noted that the BNG metric was not provided at the time in August or shared on the council's document portal and was only shared with TG on 29th April 2025 when requested from the WBC ecologist by TG. The Memorandum requested further information, which was provided by TG. The response by TG was input directly into a copy of the Memorandum – this is shown in **Appendix 2**. Following this, a second Memorandum was received on 29th November 2024 (see **Appendix 3**), the same day as the decision notice as noted above, hence not providing opportunity to respond. These are referred to as the 'first Memorandum' and 'second Memorandum' respectively throughout this report.
- 1.4. Two reasons for refusal were made on ecological grounds, as follows:
 6. *By virtue of a lack of accurate information, an assessment date for baseline biodiversity value cannot be agreed. Therefore an assessment of how 10 percent biodiversity net gain will be achieved is not possible and as such, if granted planning permission, there is no guarantee if 10 percent biodiversity net gain will be achieved, hence would be contrary to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).*
 7. *The application has failed to demonstrate the proposed development will have an acceptable impact on ecology and biodiversity by reason of the impact on protected species, wildlife and habitats, contrary to policy CP1, CP3 and CP7 of the Core Strategy, CC01 and TB23 of the MDD Local Plan and section 15 of the NPPF.*
- 1.5. The above will be referred to as Reason for Refusal (RR) 6 and RR7 respectively within this report.



- 1.6. The site was previously subject to an Outline planning application (reference: 220458) in 2022 for 200 dwellings, which was refused on the 22nd June 2022.

Purpose

- 1.7. It's understood that the refusal of the application is being appealed. This report provides clarifications that address RR6 and RR7. This report is supported by the following information:
- The amended Ecological Impact Assessment (EclA) report¹ (reference: **16452/R02b**), herein referred to as 'the EclA report';
 - The amended BNG metric² (reference: **16452/BNG/2**), herein referred to as 'the BNG metric';
 - The Bat Activity report³ (reference: **16452/R03**), herein referred to as 'the Bat Activity report'; and
 - The Tree Assessment and Compensation Strategy⁴ (reference: **16452/R05a**), herein referred to as to as 'the Compensation Strategy'.
- 1.8. This report must be read alongside all of the above, notably, the EclA report and the BNG metric are shown as submitted documents on the planning portal for the application, and were acknowledged in the second Memorandum. However, the Bat Activity Report is not. The second Memorandum notes that the Bat Activity Report was not received by WBC, though it was prepared and shared ahead of the application being refused.
- 1.9. The Compensation Strategy had intended to be controlled via a planning condition, in line with the guidance for loss of irreplaceable habitats⁵ which states "*If planning permission is given you will need to agree a compensation strategy with the LPA*", however is being submitted alongside this report, to indicate the ability to deliver an appropriate strategy to allow the resolution of RR6.
- 1.10. This report, in conjunction with the above reports and BNG metric, intends to resolve RR6 and RR7 prior to the appeal, through agreement in the Statement of Common Ground.

¹ Jones, M. (2024) *Ecological Impact Assessment: Land East of Lodge Road, Hurst*, Tyler Grange Group Limited, 21st November 2024, 16542_R02b

² Jones, M. (2024) *Statutory Biodiversity Net Gain Metric: Land east of Lodge Road, Hurst*, Tyler Grange Group Limited, 20th November 2024, 16452_BNG_2

³ Curtis, S. (2024) *Bat Activity Report: Land East of Lodge Road, Hurst*, Tyler Grange Group Limited, 10th October 2024, 16542_R03

⁴ Pratt, J., Jones, M. (2025) *Tree Assessment and Compensation Strategy: Land between Lodge Road and Tape Lane, Hurst*, Tyler Grange Group Limited, 3rd June 2025, 16452/R05a

⁵ GOV.UK, (Published 22 February 2024, Last updated 4 September 2024) Guidance: Irreplaceable habitat, Compensation rules for irreplaceable habitat, Available at: <https://www.gov.uk/guidance/irreplaceable-habitats> [Accessed 17/04/2025]



Section 2: Ecological Baseline Clarifications

- 2.1. This section sets out and describes ecological information pertaining to the site, with reference to the first and second Memorandums (see **Appendices 2 and 3**) and the comments received from WBC within a previous iteration of the BNG metric (comments received on 30th August 2024). Where appropriate, sub-titles align with those within the Memorandums themselves, for ease.
- 2.2. The second Memorandum acknowledges the TG response given to the first Memorandum. However, a number of points remain unresolved, and the second Memorandum is not specific as to which points these are. As such, whilst TG have already responded to points made in the first Memorandum, these are reiterated and expanded upon in this report to provide clarity.

Biodiversity Net Gain

- 2.3. The following sets out information requested by WBC relating to the ecological baseline of the site, and relate to RR6.

Irreplaceable Habitat

- 2.4. Additional information on the methodology used to classify of veteran trees (which are an Irreplaceable Habitat in BNG) was requested. Veteran trees are defined as follows within Table 2 of The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024⁶:

“Veteran trees exhibit one or more of the following—

(i) significant decay features such as deadwood, hollowing or signs of advanced decay in the trunk or major limbs

(ii) a large girth, depending on and relative to species, site and management history

(iii) a high value for nature, especially in hosting rare or specialist fungi, lichens and deadwood invertebrates”

- 2.5. Notably, arboricultural definitions do not include feature (iii), and the above definition states only “one or more” features must be present for a tree to be classed as veteran. In the case of the site, trees were assessed against the above criteria and no additional trees which were not already classed as veteran by the Preliminary Arboricultural Impact Assessment (AIA)⁷ (reference: **16452/R01**), were identified – see the Tree Assessment and Compensation Strategy⁸ for further details.

⁶ The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024, Available at: <https://www.legislation.gov.uk/uksi/2024/48/schedule/made> [Accessed 27/05/2025]

⁷ Pratt, J. (2024) *Preliminary Arboricultural Impact Assessment: Land east of Lodge Road, Hurst*, Tyler Grange Group Limited, 2nd July 2024, 16452/R01a

⁸ Pratt, J., Jones, M. (2025) *Tree Assessment and Compensation Strategy: Land between Lodge Road and Tape Lane, Hurst*, Tyler Grange Group Limited, 3rd June 2025, 16452/R05a



Degradation

Veteran Trees

- 2.6. The EclA report and the BNG metric were both updated in December 2024 to acknowledge degradation which had occurred on site, which became known to TG over the course of receiving consultation responses and photographic evidence. This is in line with paragraphs 6 and 6A of Part 1 of Schedule 7A of the Town and Country Planning Act 1990 as amended⁹, which states the following:

"6 If—

(a) a person carries on activities on land on or after 30 January 2020 otherwise than in accordance with—

(i) planning permission, or

(ii) any other permission of a kind specified by the Secretary of State by regulations, and

(b) as a result of the activities the biodiversity value of the onsite habitat referred to in paragraph 5(1) is lower on the relevant date than it would otherwise have been, the pre-development biodiversity value of the onsite habitat is to be taken to be its biodiversity value immediately before the carrying on of the activities.

6B

(1) This paragraph applies where there is insufficient evidence of the biodiversity value of an onsite habitat immediately before the carrying on of the activities referred to in paragraph 6 or 6A.

(2) The biodiversity value of the onsite habitat immediately before the carrying on of the activities referred to in paragraph 6 or 6A is to be taken to be the highest biodiversity value of the onsite habitat which is reasonably supported by any available evidence relating to the onsite habitat."

- 2.7. The BNG metric has been updated with the latest diameter at breast height (BDH) information (see report **16452/R05a**), though with the Compensation Strategy 10% net gain is achieved within the metric submitted pre- decision and now.
- 2.8. The two trees lost as a result of works by the landowner at the time and prior to Tyler Grange project involvement, T85 and T86, in the absence of information and in line with paragraph 6B above, have been assumed to be veteran as a precaution under the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024 definition. As recognised in the EclA report¹⁰, the development proposals cannot avoid this impact, as it has already occurred.

⁹ Town and Country Planning Act 1990, Available at: <https://www.legislation.gov.uk/ukpga/1990/8/schedule/7A> [Accessed 27/05/2025]

¹⁰ See paragraph 4.8 of the EclA report



- 2.9. A Compensation Strategy for the loss of trees T85 and T86 has been put forward¹¹, in line with the following guidance¹² which states:

"Special compensation rules apply to irreplaceable habitat.

If planning permission is given you will need to agree a compensation strategy with the LPA.

Compensation for irreplaceable habitat needs to be relative to the baseline habitat type. The LPA will agree compensation as part of the determination of the planning application, on a case-by-case basis."

On-Site Habitat Baseline

Grassland

- 2.10. The grassland on site was entirely assessed to be modified grassland g4 within the EcIA report and BNG metric. This was queried as previous ecology report(s) relating to the site (submitted as part of the previous Outline application (reference: 220458)) classified some areas as 'other neutral grassland' and 'ruderal/ephemeral'. Other neutral grassland g3c is a medium distinctiveness habitat, and modified grassland g4 is a low distinctiveness habitat – as such whether this was degradation in line with paragraphs 6 and 6A of Part 1 of Schedule 7A of the Town and Country Planning Act 1990 was queried.
- 2.11. These habitat classifications relate to the UK Habitat Classification (UKHabs) definitions, which underpin the Statutory BNG metric used to demonstrate a 10% net gain.
- 2.12. In line with paragraph 6 of Part 1 of Schedule 7A of the Town and Country Planning Act 1990, degradation in the context of BNG is when biodiversity value decreases as a result of 'a person carr[ying] on activities'. The grassland on site has been left continuously grazed, with no known changes in management or interventions that could affect the grassland habitat, in the intervening time between the previous Outline application in 2022 and the time of writing. It is therefore not the case that the biodiversity value of the grassland has been reduced due to 'a person carr[ying] on activities'.
- 2.13. Nevertheless, this report compares the assessment of grasslands completed by Ecology Solutions in 2022 and the assessment of grassland completed by TG in 2024 and 2025.
- 2.14. Principally, it should be noted that the EcIA report and BNG metric classifies habitats based on the latest version of the UKHabs, which is version 2.0 published in 2023¹³. The ecology reports used to support the previous Outline application (reference: 220458), were written by Ecology Solutions Limited in 2021-2022. Whilst it is not clear the precise UKHabs version used

¹¹ Pratt, J., Jones, M. (2025) Tree Assessment and Compensation Strategy: Land between Lodge Road and Tape Lane, Hurst, Tyler Grange Group Limited, 3rd June 2025, 16452/R05a

¹² GOV.UK, (Published 22 February 2024, Last updated 4 September 2024) Guidance: Irreplaceable habitat, Compensation rules for irreplaceable habitat, Available at: <https://www.gov.uk/guidance/irreplaceable-habitats>, [Accessed 17/04/2025]

¹³ UKHab Ltd (2023). UK Habitat Classification Version 2.0 (at <https://www.ukhab.org>)



as this is not directly referenced in the reports, it could not have been version 2.0, as this was published in 2023 – rather version 1.1 is more likely, which was published in September 2020¹⁴.

- 2.15. UKHabs V1.1. and V2.0 have different definitions of modified grassland g4 and other neutral grassland g3c, though they are named the same. These are set out below.

UKHabs V2.0 2023

- 2.16. Under the latest UKHabs V2.0, the following criteria must be met for grassland to be classified as other neutral grassland g3c:

“A neutral grassland that does not meet the definition of either g3a or g3b AND that meets at least three of these four criteria:

- 1. >20% cover of broadleaved herbs and sedges;*
- 2. >8 species per m² (including forbs, grasses, sedges and rushes, and excluding bryophytes);*
- 3. ≥1 grass species that is not generally sown for intensive agricultural production (ie. Rye-grasses *Lolium* spp., Timothy *Phleum pratense*, Cock’s foot *Dactylis glomerata*, Meadow fescue *Festuca pratensis*) is at least abundant;*
- 4. Cover of Rye-grasses *Lolium* spp. and White Clover *Trifolium repens*, where present, is <30%.”*

- 2.17. Under UKHabs V2.0, the following is the definition of modified grassland g4:

*“Species-poor vegetation (<9 species per m²) dominated by a few fast-growing grasses on fertile, neutral soils. It is frequently characterised by an abundance of Rye-grasses *Lolium* spp. and White Clover *Trifolium repens*. Most broadleaved species present will be associated with high fertility.”*

- 2.18. It is of note that the definition states the sward is ‘frequently’ characterised by abundant ryegrasses *Lolium* sp. and white clover *Trifolium repens* – it is not a defining requirement for classification of this habitat. The UKHabs V2.0 also gives the following additional information, relevant to this report:

“Inclusions:

*Species-poor grasslands that have occurred through natural succession, where cover of ryegrass *Lolium* spp. is less than ‘abundant’ on the DAFOR scale.”*

¹⁴ Butcher, B., Carey, P., Edmonds, R., Norton, L. and Treweek, J. (2020). UK Habitat Classification – habitat Definitions V1.1 at <http://ukhab.org>



- 2.19. The UKHabs V1.1 2020, likely to have been followed by Ecology Solutions, lists the definition of other neutral grassland g3c as follows:

"Neutral grassland that does not meet the definition of either g3a or g3b. Perennial Rye-grass Lolium perenne is likely to be present at <30% with between 9 and 15 further species (m2) also present. Many of the more species rich swards that were previously described as "semi-improved neutral grassland" will fall here, together with rank and unmanaged swards on neutral soils."

- 2.20. Unlike the 2.0 UKHabs, the definition is not strict, lacking a specific list of criteria to define the habitat.

- 2.21. The modified grassland g4 definition is given as follows in UKHabs V1.1 2020:

"Vegetation dominated by a few fast-growing grasses on fertile, neutral soils. It is frequently characterised by an abundance of Rye-grass Lolium spp. and White Clover Trifolium repens. [...] Species poor <9 species m-2."

2022 Assessment by Ecology Solutions

- 2.22. Of the grassland area previously considered to be other neutral grassland g3c under the previous Outline application (reference: 220458), the Onsite Biodiversity Net Gain Assessment¹⁵ stated the following, referring to this area as 'G1':

"G1 is a smaller area accounting for much less of the total area of the baseline habitat. It is located in the northwest of the site. The grassland here has remained largely ungrazed, and with that, the species composition is more varied compared to G2/G3, however species per m² is on average lower than 9. The sward height is quite varied however there is a large amount of dominating ruderal vegetation and areas of more 'rank' grassland dominated by a few grass species which negatively impact the quality of this habitat. There is also no significant bare ground present."

- 2.23. The Updated Ecological Assessment report produced by Ecology Solutions¹⁶ also gave the following species abundance information:

"Species recorded across G1 during 2022, with their DAFOR rating, include:

False Oat-grass Arrhenatherum elatius (A), Cock's-foot (A), Bramble Rubus fruticosus (A), Creeping Buttercup (A), Common Nettle (A), Meadow Buttercup (F), Spear Thistle Cirsium vulgare (F), Spear Mint Mentha chalepensis (LF), Ground Elder Aegopodium podagraria (F), Perennial Rye-grass (O), Tufted Vetch Vicia cracca (O), Lesser Stitchwort Stellaria graminea (O), Broad-leaved Dock Rumex obtusifolius (O), Common Hogweed Heracleum sphondylium (O), Ribwort Plantain (O), Black Medic Medicago lupulina (LO), Ground Ivy Glechoma hederacea (R), Germander Speedwell Veronica chamaedrys (R), Red Clover (R), Common Sorrel Rumex acetosa (R), White Dead-nettle Lamium album (R), Curled Dock Rumex crispus

¹⁵ Ecology Solutions (November 2022) Onsite Biodiversity Net Gain Assessment: Land off Lodge Road, Hurst 10428

¹⁶ Ecology Solutions (November 2022) Updated Ecological Assessment: Land off Lodge Road, Hurst, 10428.vf



(R), Barren Brome *Bromus sterilis* (R), Common Ragwort (R), Prickly Lettuce *Lactuca serriola* (R), Smooth Meadow-grass (R), Cut-leaved Crane's-bill *Geranium dissectum* (R), Common Mouse-ear (R), Creeping Cinquefoil *Potentilla reptans* (R), Soft Brome (R), Greater Burdock *Arctium lappa* (R), Oak Sapling *Quercus robur* (R), Hawthorn Sapling *Crataegus monogyna* (R), Sweet Vernal-grass (R), Green Alkanet *Pentaglottis sempervirens* (R), Black Knapweed (R), Hybrid Bluebell *Hyacinthoides non-scripta* (R), Greater Stitchwort *Stellaria holostea* (R), Yarrow (R), Meadow Vetchling *Lathyrus pratensis* (R), Red Fescue (R), Field Wood-rush *Luzula campestris* (R), Bird's-foot Trefoil (R) and Lesser Trefoil *Trifolium dubium* (R)."

- 2.24. The Ecology Solutions Onsite Biodiversity Net Gain Assessment stated that "species per m² is on average lower than 9", failing criteria 2 of the 2023 UKHabs guidance. The species abundance data given in the Updated Ecological Assessment showed that the grassland also failed criteria 3, as only one grass species not generally sown for intensive agricultural production was at least abundant (this was false oat-grass *Arrhenatherum elatius*). Whether the grassland failed criteria 1 and 4 is not clear based on the information in the Ecology Solutions reports, however this is not considered relevant as the grassland cannot be classified as other neutral grassland g3c regardless.

2024-2025 Assessment by TG

- 2.25. The grassland on site, in its entirety, fits the most recent UKHabs definition of modified grassland g4, and does not fit the definition of other neutral grassland g3c. This was considered true during both the initial UKHabs survey on the 12th December 2023, and on the survey conducted during the optimal botanical survey season on 8th May 2024.
- 2.26. Upon review of the ecology reports produced for the previous Outline application (reference: 220458), no discernible change in grassland composition could be found between the data collected in 2022 and in 2024. As such, the change in classification can be attributed entirely to the change in UKHabs definitions, and there is no evidence of degradation.
- 2.27. Habitat data for grassland was initially collected by TG during the UKHabs surveys on 12th December 2024 and 8th May 2024. For the purposes of this report, an update assessment of grasslands was undertaken on 16th April 2025¹⁷. The 16th April 2025 survey involved ten quadrats (see the Quadrat Location Plan **16452/P11**)¹⁸ of the grassland previously classified as 'other neutral grassland' or 'ruderal/ephemeral' in the previous Outline application (reference: 220458).
- 2.28. At the time of the UKHabs survey on the 8th May 2024, ten quadrats were undertaken on site – these results are shown in **Table 2** below. This included two quadrats of grassland previously categorised as other neutral grassland, and one of grassland previously categorised as ruderal/ephemeral. As the entire area was assessed at modified grassland, ten quadrats were considered sufficient at the time of the survey. **Table 1** below therefore presents more detailed information collected.

¹⁷ Both surveys were undertaken by Mari Jones, a qualifying member of the Chartered Institute of Ecology and Environmental Management and an ecologist suitably experienced in undertaking UKHabs survey.

¹⁸ All quadrats are 1 m².



Table 1: Quadrat Data for Grassland Previously Assessed as Other Neutral Grassland Under Superseded UKHabs v1.1; Data Collected 16th April 2025.

Scientific name	English name	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
<i>Lolium perenne</i>	Perennial rye-grass	R	F	F	R	A	F	O	O	O	F
<i>Dactylis glomerata</i>	Cock's foot	R	A	R	A	R	R	O	R	O	O
<i>Arrhenatherum elatius</i>	False oat grass	O	O		R				O		R
<i>Ranunculus repens</i>	Creeping buttercup	R	R	O		O	O	F	A		O
<i>Trifolium repens</i>	White clover	D		O			F	O			
<i>Plantago lanceolata</i>	Ribwort plantain					R	R	R			
<i>Urtica dioica</i>	Common nettle		O						F	A	
<i>Cerastium fontanum</i>	Common mouse-ear	R							R	R	
<i>Rumex obtusifolius</i>	Broad-leaved dock	O						A	O		
<i>Lotus corniculatus</i>	Bird's foot trefoil		R			R	R				
<i>Ranunculus acris</i>	Meadow buttercup			R			O				R
<i>Cirsium arvense</i>	Creeping thistle				R				R	R	
<i>Impatiens glandulifera</i>	Himalayan balsam		R	R							
<i>Rumex acetosa</i>	Common sorrel			R							R
<i>Aegopodium podagraria</i>	Ground elder				A						
<i>Plantago major</i>	Greater plantain	O									



<i>Potentilla reptans</i>	Creeping cinquefoil			R							
<i>Prunella vulgaris</i>	Selfheal						R				
<i>Phleum bertolonii</i>	Smaller cat's tail						R				
<i>Pentaglottis sempervirens</i>	Green alkanet							R			
<i>Persicaria maculosa</i>	Redshank							R			
<i>Holcus lanatus</i>	Yorkshire fog									R	
<i>Rumex crispus</i>	Curled dock									R	
<i>Heracleum sphondylium</i>	Hogweed									R	
<i>Convolvulus arvensis</i>	Field bindweed									R	
<i>Veronica chamaedrys</i>	Germander speedwell										R
<i>Centaurea nigra</i>	Common knapweed										R
<i>Achillea millefolium</i>	Yarrow										R
<i>Bellis perennis</i>	Common daisy										R
<i>Carex sp.</i>	Sedge species										R
Total		8	7	8	5	5	9	8	8	9	11
Average species per m²:		7.8									



Table 2: Quadrat Data Collected Across all Grassland on Site, Collected 8th May 2024

Scientific name	English name	Q1	Q2	Q3	Q4	Q5	Q6	Q7	Q8	Q9	Q10
<i>Lolium perenne</i>	Perennial rye-grass	A	D	R		A	O	O	O	O	R
<i>Ranunculus repens</i>	Creeping buttercup	R	O		O		O	D		A	
<i>Trifolium repens</i>	White clover	F	R		R	A			O		
<i>Ranunculus acris</i>	Meadow buttercup	O		R				R		O	R
<i>Phleum pratense</i>	Timothy	R			R						O
<i>Rumex obtusifolius</i>	Broad-leaved dock	R		R		R	R	R			
<i>Prunella vulgaris</i>	Selfheal	R									
<i>Dactylis glomerata</i>	Cock's foot		R	R	R		O		R		A
<i>Arrhenatherum elatius</i>	False oat grass			O	A			R			
<i>Alopecurus pratensis</i>	Meadow foxtail		O				R				
<i>Achillea millefolium</i>	Yarrow		R	R							
<i>Holcus lanatus</i>	Yorkshire fog				O					R	
<i>Plantago lanceolata</i>	Ribwort plantain				R	R	R				
<i>Urtica dioica</i>	Common nettle								O		
<i>Cerastium fontanum</i>	Common mouse-ear				R	R					
<i>Phleum bertolonii</i>	Smaller cat's tail							R			R
<i>Rumex crispus</i>	Curled dock								R		



<i>Plantago major</i>	Greater plantain							R			R
<i>Cirsium arvense</i>	Creeping thistle		O							R	
<i>Bellis perennis</i>	Common daisy					R		R			
<i>Impatiens glandulifera</i>	Himalayan balsam										R
<i>Potentilla reptans</i>	Creeping cinquefoil								R		
<i>Lotus corniculatus</i>	Bird's foot trefoil										R
<i>Veronica chamaedrys</i>	Germander speedwell									R	
<i>Centaurea nigra</i>	Common knapweed				R						
Total		7	7	6	9	6	6	8	6	6	8
Average species per m²:		6.9									



- 2.29. The data collected by TG in 2024 and again in 2025 also found that the grassland failed criteria 2 and 3: species per m² was on average 7.8 in the most recently collected data, as shown in **Table 1**; and no grasses not generally sown for intensive agricultural production was at least abundant. The grassland also failed criteria 1 (as on average, grasses dominated the sward) and in some (but not all) quadrats failed criteria 4¹⁹.
- 2.30. As it is required to meet at least three of the four given criteria, this grassland cannot be classified as other neutral grassland g3c.
- 2.31. Vegetation was not dominated by perennial rye-grass or white clover - nevertheless the high occurrence of a few fast growing grass species (perennial ryegrass, false oat-grass, and cock's foot *Dactylis glomerata*) and the frequency of broadleaved species associated with high fertility (including creeping buttercup *Ranunculus repens*, broadleaved dock *Rumex obtusifolius*, hogweed *Heracleum sphondylium*, etc.) demonstrates that the grassland fits the UKHabs V2.0 definition of modified grassland g4 based on both Ecology Solutions data in 2022 and TG data in 2024 and 2025.

Grazing

- 2.32. The first Memorandum asks the question: *'How has the limitation of the grassland being under high grazing pressure at the time of the survey visits been accounted for when determining the grassland type?'*
- 2.33. It's not specified in what way grazing pressure would be a limitation. If the intended meaning was that identification of plant species is more difficult under grazing, this is generally true, however the grassland has been surveyed three times²⁰ and species present could be identified vegetatively, where inflorescences/flowers were grazed. This was therefore not considered a limitation on either the 8th May 2024 or the 16th April 2025.
- 2.34. If the intended meaning was that the grassland type may change under heavy grazing pressure, this is also true, however the site has been under continuous grazing for many years. The grassland type should be assessed as what it is, rather than what it hypothetically could be if it were under a different land use or grazing regime.

Condition Assessment

- 2.35. The first Memorandum notes that the modified grassland g4 was assessed to be in 'fairly good' condition in the 2022 Ecology Solutions report, but is now assessed as 'moderate' condition. This 'degradation' is queried in both Memorandums.
- 2.36. The BNG metric condition assessment sheets provide condition criteria for 'good', 'moderate', and 'poor' condition habitats. Use of 'fairly good' and 'fairly poor' are intermediate categories

¹⁹ This is a change in the criteria failed as given in the "Applicant response to WBC Ecology" submitted to the planning portal on 3rd December 2024 – this is because the description given related to the grassland as a whole across site. This section within this report refers to the grassland previously assessed as 'other neutral grassland' only.

²⁰ 12th December 2023, 8th May 2024, and 16th April 2025, by Mari Jones, an ecologist experienced in undertaking UKHabs survey and with a FISC grade of 3



generally not used without robust justification. The BNG User Guide²¹ states the following on page 24:

"Biodiversity metric condition sheets can be used to evidence good, moderate or poor condition. Fairly good and fairly poor are intermediate condition categories. If you need to use these, you should:

- *complete a biodiversity metric condition assessment sheet*
- *make site specific judgements using ecological expertise*
- *explain any deviations against specific condition criterion*
- *provide ecological reasoning."*

2.37. The BNG User Guide also states in Appendix Table F:

"Assigning a habitat either of the condition types with the qualifier 'fairly' will cause a check flag to be raised.

Sound ecological evidence must be provided to justify the use of fairly categories."

2.38. The use of 'fairly' therefore needs to be justified by 'sound ecological evidence'; in this case no reason can be found to deviate from the condition given by the condition assessment sheets within the Ecology Solutions reports. The grassland fits the condition assessment criteria for 'moderate' condition²² and TG found no additional sound ecological evidence through the surveys in 2024 and 2025 to justify use of the 'fairly' category.

2.39. One of the condition assessment criteria failed was the presence of invasive species – this was due to Himalayan balsam *Impatiens glandulifera* being found throughout the sward. This plant was previously only found within the ditches/treelines of the site, and as such the difference in condition score could be attributed to the spread of this plant. The presence of Himalayan balsam has not been caused by 'a person carr[ying] on activities' on the site, which is required for a reduction in biodiversity value to be considered 'degradation'. Rather, this plant is invasive and is known to spread quickly, not requiring human intervention to do so.

Conclusion

2.40. Based on the UKHabs V2.0 2023, the grassland on site can all be classified as modified grassland g4. No degradation has taken place between the time Ecology Solutions conducted their assessment of grasslands in 2022 and when TG has assessed grassland in 2024 and 2025. Furthermore, to the knowledge of TG no person has carried out activities on site that could reduce the value of the grassland on site between 2022 and 2024/2025.

²¹ Department for Environment & Rural Affairs (July 2024) *The Statutory Biodiversity Metric User Guide*, Available at: https://assets.publishing.service.gov.uk/media/669e45fba3c2a28abb50d426/The_Statutory_Biodiversity_Metric_-_User_Guide_23.07.24_.pdf [Accessed 28/04/2025]

²² See Table 4.1 of the EclA report



- 2.41. In line with the latest condition assessment sheets published by Defra for use in informing the Statutory BNG metric, this grassland is of 'moderate' condition.

Individual Trees

- 2.42. The first Memorandum requested further information on the boundary trees:

Please can further information be provided to confirm how on-site individual trees (that are not within recorded hedgerow or line of tree features) around the boundary have been included within the metric – e.g. T21, T22, T23, G58, T59.

- 2.43. A short length of TL1 was considered to be along the southern end of Hatchgate Ditches – this is accounted for in the 0.40 km length listed in the BNG metric, however due to a mapping error this was not shown on the first submitted iteration of the Habitat Features and Ground Level Tree Assessment Plan (reference **16452/R03**). The amended EcIA report subsequently submitted had a corrected version of this plan appended (reference **16452/R03b**).

- 2.44. The first Memorandum states:

I am not convinced that the current condition assessment of the itemised veteran trees is correct. These trees should be assessed on an individual basis (page 21 of the Statutory Metric User Guide) so automatically pass condition criterion B.

- 2.45. Criterion B, which is assessed as a pass or fail, is as follows:

"The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion)."

- 2.46. As per page 21 of the User Guide: "You should record all ancient and veteran trees as individual trees separately on a single data entry row and mark these as an irreplaceable habitat". The term "individual tree" here is used to refer to the name of the broad habitat type as used within the metric – it does not mean said trees are standalone (as in, separate from a group, block, or line of trees). The condition criteria B is failed as these trees are part of a line of trees, where the canopies in the line of trees is gappy. If this were amended, it would not make a material difference as the enhancements to Irreplaceable habitats does not pull through.

- 2.47. The first Memorandum also notes on the condition assessment for individual trees, with "respect to condition criterion D, the presence of a browsing line is natural and seen in very high distinctiveness habitats such as wood-pasture. I do not consider this an adverse impact on tree health by human activity and therefore recommend that this criterion should also be passed".

- 2.48. Criterion D is as follows, which is also assessed as a pass or fail:

"There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height."



- 2.49. Some browsing is certainly a part of natural processes in the case of wild animals or low density conservation grazing, however excessive over-grazing by domestic horses/donkeys kept by humans with no presence of guard wire or protective fencing around the tree was considered a *'detrimental agricultural activity'*. To provide further evidence, **Appendix 4** of this report shows photographs of browsing damage showing long-term adverse impacts to the health of trees on site. Photographs also show supplementary feeding of hay, showing the site is over-stocked in terms of grazing provision for livestock.

On-site Hedge Baseline

- 2.50. The first Memorandum notes some clarity points regarding lines of trees: *"There appears to be a tree line identified on the baseline map that has not been assessed – the tree line from G73 to T76. Please can this be labelled and included within the metric."*
- 2.51. TL5 includes the treeline along the adjacent line, as shown on the Habitat Features and Ground Level Tree Assessment plan **16452/P03b** (appended to the EclA report). T76 is off site, but G73 is a hedgerow of blackthorn, which is included in the existing plan as H3. The Preliminary AIA includes trees with RPAs encroaching site, but these do not need to be included in BNG where the habitat lies outside of the site red line.

Line of Trees Condition Assessments

- 2.52. The first Memorandum asks: *"Please can further information be provided as to how condition criteria B and E were failed for TL1 and TL5."*

- 2.53. Conditions B and E of the BNG condition assessments are as follows:

"B: Tree canopy is predominantly continuous with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide.

E: At least 95% of the trees are in a healthy condition (deadwood or veteran features valuable for wildlife are excluded from this). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity."

- 2.54. TL1 and TL5 both have canopy gaps over 10% and browsing damage on over 5% of trees (some but not all trees have decline/damage described in the Preliminary AIA tree schedule, such as T12, G73, T74). Further photographs of the browsing damage to trees are shown in **Appendix 4**.

Hedgerow Condition Assessments

- 2.55. Further information is requested in the first Memorandum: *"Please can further information be provided as to how condition criterion E2 was assessed for hedgerow H2. The comment that 'some' showed poor health with damage needs to be reassessed as a percentage showing poor health with evidence of this."*
- 2.56. Well over the required 5% was damaged, with trees (as detailed in the Preliminary AIA) G35 in poor condition with stem damage, T36 with browsing damage. As this hedgerow had few



trees, (only T32 and T33 undamaged), this is approximately 50% of trees showing damage. Photographs are shown in **Appendix 4**.

On-site Watercourse Baseline

Culvert

- 2.57. Hatchgate Ditches (labelled D1 in the Habitat Features and Ground Level Tree Assessment plan **16452/P03b** (appended to the EcIA report)) ends in a blocked culvert at its northernmost point. As the culvert is blocked with no evidence of it's continued function, the culvert was not mapped as a habitat as part of the baseline of the watercourse BNG assessment.

Encroachment

- 2.58. The first Memorandum queried how encroachment within the watercourse component of the BNG metric was assessed. As per the BNG User Guide²³:

Riparian zone encroachment is any feature or intervention within the riparian zone that reduces the quantity, quality or ecological function of the riparian habitat includes:

- *buildings or hardstanding*
- *management practice (including agriculture)*
- *structures that prevent wildlife from accessing the riverbank'*

- 2.59. While vegetated gardens are not specifically within the provided list, they are classed as an 'Urban' habitat. Gardens have been included as encroachment here as they reduce the quality and ecological function of riparian habitat – managed lawns and non-native planting generally found in gardens are of lower quality to wildlife than natural riparian vegetation, and offer limited ecological functionality. To further contribute to the definition of gardens being encroachment, there is a fence running along the bank top between D1 and the gardens, reducing the ecological function of the riparian zone and preventing some wildlife from accessing the riverbank, which is the definition of encroachment, as per the User Guide.
- 2.60. In terms of the bankside within the site: the horse/donkey pasture is created directly as a result of grazing by livestock, it does meet the criteria to be classed as agriculture. The only exception to this could be if horses were specifically being used in some form of habitat restoration or management to mimic low-intensity natural grazing which is not the case at this site. Rather, the grazing is high-intensity, and reduces the quality and ecological function of the riparian habitat within the site. This is evidenced by the lack of diverse natural riparian vegetation, with only small patches of bramble *Rubus fruticosus agg.* and nettle *Urtica dioica* forming the riparian vegetation within grazed areas.

²³ Department for Environment & Rural Affairs (July 2024) *The Statutory Biodiversity Metric User Guide*, Available at: https://assets.publishing.service.gov.uk/media/669e45fba3c2a28abb50d426/The_Statutory_Biodiversity_Metric_-_User_Guide_23.07.24_.pdf [Accessed 28/04/2025]



- 2.61. The exemption of 'existing small amenity features and utility units where the total footprint is less than 5% of the riparian zone area' is not relevant, as the garden these sheds reside in are entirely assessed as being riparian encroachment.

Date of the Baseline BNG Assessment

- 2.62. RR6 states:

By virtue of a lack of accurate information, an assessment date for baseline biodiversity value cannot be agreed. Therefore an assessment of how 10 percent biodiversity net gain will be achieved is not possible and as such, if granted planning permission, there is no guarantee if 10 percent biodiversity net gain will be achieved, hence would be contrary to Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

- 2.63. The Biodiversity Gain Regulations 2024 states:

5 (1) In relation to any development for which planning permission is granted, the pre-development biodiversity value of the onsite habitat is the biodiversity value of the onsite habitat on the relevant date.

(2) The relevant date is—

(a) in a case in which planning permission is granted on application, the date of the application, and

(b) in any other case, the date on which the planning permission is granted.

(3) But the person submitting the biodiversity gain plan for approval and the planning authority may agree that the relevant date is to be a date earlier than that specified in subparagraph (2)(a) or (b) (but not a date which is before the day on which this Schedule comes into force in relation to the development).

(4) This paragraph is subject to paragraphs 6 [F2, 6A, 6B] and 7.

- 2.64. As such, the baseline should be taken at the 'date the planning permission is granted' – as this has not occurred yet, the data provided from the most recent site visit in April 2025 (which confirms the results of previous assessment) and the clarifications provided to date and within this report is the closest to said date.

- 2.65. In relation to the veteran trees T85 and T86, the baseline date must align with the following from paragraph 6 of the Biodiversity Gain Regulations 2024, as quoted in paragraph 2.6 of this report:

'the pre-development biodiversity value of the onsite habitat is to be taken to be its biodiversity value immediately before the carrying on of the activities'

- 2.66. Therefore, the value of this specific habitat (trees T85 and T86) should be taken as the date immediately before the loss of these trees, in March 2021. Further detail is given in the Irreplaceable Habitat Compensation Strategy (reference: **16452/R05a**).



2.67. RR6 notes that *'there is no guarantee if 10 percent biodiversity net gain will be achieved'*. At Outline application stage, only the baseline value of the site need to be agreed; the post-development portion of the BNG metric is given as to show a likely means of achieving 10% net gain. However, the mechanism for achieving 10% net gain is fixed at Reserved Matters (RM) stage. Whilst the Biodiversity Gain hierarchy needs to be followed, if 10% net gain on-site cannot be achieved at RM stage, off-site credits can be purchased. Whilst credits within the same Local Authority/National Character Area are prioritised, statutory credits can be bought as a last resort. Therefore, there can be a guarantee that even in a worst-case scenario, a 10% net gain can be achieved by the development.



Bats

Bat Activity

- 2.68. The first Memorandum requests that *'further justification be given for considering the site to have low suitability for foraging and commuting bats'*
- 2.69. It is acknowledged that the habitats types on site lie somewhere between low and moderate suitability, within the good practice guidelines²⁴. Definitions of low and moderate suitability are set out in the good practice guidelines as follows, taken from Table 4.1:
- 2.70. Low suitability - *"Habitat that could be used by small numbers of bats as flight-paths such as a gappy hedgerow or unvegetated stream, but isolated, i.e. not very well connected to the surrounding landscape by other habitat. Suitable, but isolated habitat that could be used by small numbers of foraging bats such as a lone tree (not in a parkland situation) or a patch of scrub."*
- 2.71. Moderate suitability - *"Continuous habitat connected to the wider landscape that could be used by bats for flight-paths such as lines of trees and scrub or linked back gardens. Habitat that is connected to the wider landscape that could be used by bats for foraging such as trees, scrub, grassland or water."*
- 2.72. Given the majority of the site is modified grassland, with limited variation in habitat/ecotone between the grassland and boundary trees/hedgerows, the assessment was made as low, in line with previous assessments by Ecology Solutions. It was not considered proportionate to increase survey effort for these update surveys.
- 2.73. Furthermore, guidance also states that survey effort should be proportionate to the expected impacts (para 8.2.47); *'type and diversity of habitats affected; predicted impacts of the proposed development on bats; type and scale/size of proposed development'*.
- 2.74. As watercourses and linear features are being retained, enhanced, and buffered, with lighting expected to be controlled via condition, seasonal surveys were considered proportionate to the predicted impact of the proposed development on bats. Fundamentally, results of any additional survey effort would not affect the mitigation approach as all features of importance to bats are being retained and buffered, with bat-sensitive lighting post-development expected to be conditioned and designed as per the latest guidance note²⁵.

Ground Level Tree Assessment

- 2.75. A Ground Level Tree Assessment (GLTA) can only assess a tree as FAR for certain as per guidance, which states *"6.7.14 During a GLTA, the suitability of trees and PRFs can be categorised according to categories outlined in Tables 4.2. and 6.2 respectively. However, at*

²⁴ Collins, J. (ed.) (2023) Bat Surveys for Professional Ecologists: Good Practice Guidelines (4th edition). The Bat Conservation Trust, London.

²⁵ Institute of Lighting Professionals, Bat Conservation Trust, 2023, Bats and Artificial Lighting in the UK Guidance Note GN 08 / 23, Warwickshire



this stage PRFs are not inspected in any detail and therefore this is only an estimate of their potential for supporting roosting bats”.

2.76. Nevertheless, as additional information has been requested, **Table 3** below details the individual potential roost features (PRFs) of each tree, along with a likely reasonable worst-case scenario for PRF classification. Whilst a GLTA was conducted on the 12th December 2023, it's acknowledged that a long period of time has elapsed since that survey. As such, an update GLTA was undertaken on the 16th April 2025 to inform this report and further updates where considered necessary could be controlled via a condition to inform any Reserved Matters application. **Table 3** shows the results of the update GLTA, and the Ground Level Tree Assessment plan **16452/P11** shows the locations of the trees assessed to have bat roost potential.

2.77. When assessing the potential of a feature to support roosting bats, specifically in trees, good practice guidance defines types of PRFs as follows, taken from Table 6.2:

“PRF-I: PRF is only suitable for individual bats or very small numbers of bats either due to size or lack of suitable surrounding habitats.

PRF-M: PRF is suitable for multiple bats and may therefore be used by a maternity colony.”

2.78. As some time has passed between GLTA surveys, some changes were noted in the bat roost potential of some trees, largely due to decay or deadwood naturally changing over time. Tree T10 previously had potential to support roosting bats due to a knot hole in a dead branch; this branch has since fallen off, and so T10 now has negligible potential to support roosting bats. Tree T62 previously was assessed as having negligible potential to support roosting bats, however decay (and possibly rubbing of livestock) over time has exposed cavities, resulting in a PRF.

2.79. Proportionality to the expected adverse impact is considered important in good practice guidance, where paragraph 2.2.17 states that *‘the type of survey (or suite of surveys) undertaken and the amount of effort expended should be proportionate to the predicted impacts of the proposed activities on bats’*. In this case, all trees are being retained and would be protected from disturbance through appropriate lighting strategies. The ODPM Circular 06/05 that states that surveys are only needed if a protected species could be present and would be affected by development proposals. If further surveys were to find a maternity roost, the recommended action would be to implement a Precautionary Working Method Statement (PWMS) to avoid disturbance during construction, and a bat-sensitive lighting strategy to be implemented for the operational phase of the development. This approach is already proposed as set out in paragraphs 3.20 and 5.10 of the EclA report, as well as in the Bat Activity Report – therefore additional survey effort would not be of benefit to or amend the approach.

Embedded Protected Species Mitigation

2.80. All trees with bat roost potential are being retained by the proposals, with buffers for trees as per the Preliminary AIA. A condition is invited (as per paragraph 5.10 of the EclA report) to control lighting to prevent impacts at RM stage, to include all trees assessed to have bat roost



potential (and to control noise/lighting/vibration within root protection areas) as well as flightlines.



Table 3: Ground Level Tree Assessment with Photographs

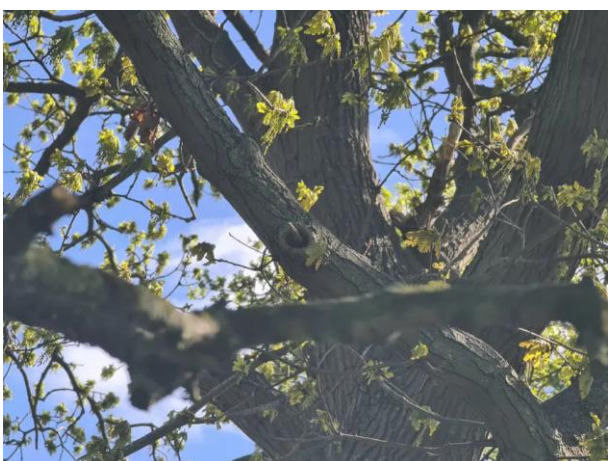
Tree ²⁶ No. and Species	Potential Roost Feature (PRF) Description and Assessment	Photograph of PRF
T3 - Grey poplar <i>Populus canescens</i>	<u>PRF3a</u> - North aspect, woodpecker hole. Potentially up to a PRF-M .	
T8 – Pedunculate oak <i>Quercus robur</i>	No PRFs were noted, however this was recorded as ivy <i>Hedera helix</i> cover was a survey limitation that may conceal PRFs.	
T10 - Pedunculate oak	This tree was previously noted to have a PRF at the end of a dead branch, however during the update survey on 16th April 2025 this dead branch had fallen off. As such, this tree has been reassessed as having negligible suitability to support roosting bats .	
T13 – Pedunculate oak	No PRFs were noted, however this was recorded as ivy cover was a survey limitation that may conceal PRFs.	
T14 – Pedunculate oak	<u>PRF14a</u> – Approximately 10 m high on the northern aspect of the tree. PRF is a healed wound, elongated and twisted, possibly due to wind. Could be up to a PRF-M .	

²⁶ All tree numbers align with the AIA, reference: 16452/R01



T15 – Pedunculate oak	<u>PRF15a</u> – Damage to a dead limb on the northern part of the tree, which could lead to a cavity within the deadwood. Up to a PRF-M.	
	<u>PRF15b</u> – The remains of a dead limb on the southern branches of the tree, which has mostly fallen off. The broken end is split and could lead to a cavity within the living branch, or the splits could form crevices. Up to a PRF-M.	
	<u>PRF15c</u> – A wound on a northern branch of a tree. The living branch has healed around a dead limb, but gaps in the wound could lead to a crevice or cavity. Up to a PRF-M.	
T19 – Deadwood, assumed to have been a pedunculate oak.	<u>PRF19a</u> – A former know hole on the eastern aspect of the deadwood. Up to a PRF-M.	
	<u>PRF19b</u> – Lifted bark on the southern aspect. Likely to be a PRF-I.	

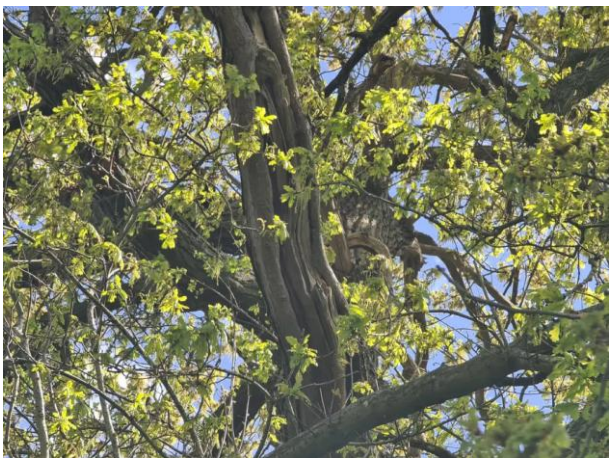


T22 – Ash <i>Fraxinus excelsior</i>	<u>PRF22a</u> – Damage, likely from rubbing horses, which has partly healed and the scar tissue has created a small cavity behind it in the trunk. PRF-M.	
T32 – Pedunculate oak	<u>PRF32a</u> – A knot hole on the western aspect, which appears to lead to a cavity. Likely PRF-M. This tree is also covered in ivy, which could conceal a PRF.	
T33 – Pedunculate oak	No PRFs were noted, however this tree was recorded as ivy cover was a survey limitation that may conceal PRFs.	
T44 – Pedunculate oak	<u>PRF44a</u> – A small tea out on a branch, around three metres high on the western aspect. Could be up to a PRF-M as it could lead to a cavity in the branch.	
T47 – Pedunculate oak	<u>PRF47a</u> – a small hole two metres high on the northern aspect of the trunk. Could be up to a PRF-M.	



	<u>PRF47b</u> – Another small hole, this time four metres high on the northern aspect of the trunk. Could be up to a PRF-M.	
G50 – Hazel <i>Corylus avellana</i>	<u>PRF50a</u> – Grazing or rubbing damage and scarred wood, leading to a possible small cavity in the trunk of the coppiced hazel. PRF-M.	
T54 – Pedunculate oak	<u>PRF54a</u> – A dead limb on the northern side of the tree from horses/donkeys rubbing the wood. Internal rotting has hollowed the deadwood. PRF-M.	
G56 – Pedunculate oak	<u>PRF56a</u> – A small hole on the western aspect, which could lead to a cavity. PRF-M.	
T62 – Ash	<u>PRF62a</u> – Severe rubbing/browsing damage to the stem has resulted in exposure of internal cavities. PRF-M. This did not have bat roost potential at the time of the original GLTA survey, however rubbing or possibly decay has resulted in a feature forming.	



T70 – Pedunculate oak	<u>PRF70a</u> – Lifted bark on the northern aspect, around five metres high. Could be up to a PRF-M.	
	<u>East 70b</u> Could be up to a PRF-M.	
	<u>North 70c</u> Could be up to a PRF-M.	
	<u>East 70d</u> Could be up to a PRF-M.	
T74 – Pedunculate oak	<u>PRF74a</u> – An old wound from damage/disease on a branch on the western aspect of the tree, partly healed. Could be up to a PRF-M.	



T78 – Pedunculate oak (Erroneously labelled T77 in the EclA report.)	<u>PRF78a</u> – Desiccation features, around five metres high on the southern aspect. Could be up to a PRF-M.	
	<u>PRF78b</u> – A woodpecker hole, around eight metres high on the southern aspect. Could be up to a PRF-M.	
T79 – Sycamore <i>Acer pseudoplatanus</i> (Erroneously labelled T80 in the EclA report.)	No PRFs were noted, however this tree was recorded as ivy cover was a survey limitation that may conceal PRFs.	
NA - deadwood	Previously noted in the EclA report as the fallen deadwood may form PRFs over time, however no PRFs were noted on either the 2024 GLTA or 2025 GLTA survey.	



Section 3: Conclusion

- 3.1. This report provides clarification on points raised in both Memorandums received from WBC. The above clarifications to the existing ecological information is considered sufficient – in conjunction with the agreement of bespoke compensation for the loss of trees T85 and T86 set out in the separate document **16452/R05a** – to resolve RR6 and RR7.



Appendix 1: Site Location Plan



Appendix 2: First Memorandum from Wokingham Borough Council (30th August 2024) including Tyler Grange Response



Appendix 3: Second Memorandum from Wokingham Borough Council (29th November 2024)



Appendix 4: Photographs

Photographs of browsing/rubbing damage to tree T15:



Instances of browsing and rubbing damage from horses and donkeys for trees throughout the site, in treelines TL1, TL5, and trees in hedgerow H3:











Plans:

Plan 1: Quadrat Location Plan **16452/P11**

Plan 2: Ground Level Tree Assessment Plan **16452/P12**





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