

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	251488
Address:	Dairy Cottage, Heathlands Road, Wokingham, RG40 3AN.		
Proposal:	Full application for the proposed erection of 5no. dwellings with associated landscaping, open space and entrance gate following demolition of existing dwellings.		
Type of Development:	Minor Dwellings (1-9)		
Site Visit Made:	Yes/ 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

Documents reviewed for this proposal are as follows; Preliminary Ecological Appraisal and Preliminary Roost Assessment – Amendment, Issue 5, 28/04/2024, Bat Emergence and Re-Entry Survey (BERS) 09/07/24, Biodiversity Net Gain Assessment – Final Issue 4, 28/04/25 and The Statutory Biodiversity Metric Tool 28/04/25 all produced by Arbtech.

Biodiversity Net Gain Assessment and Statutory Metric Tool.

I agree with the application ecologist on all habitat classifications listed within the ‘A-1 Habitat Baseline’.

As for the B-1 On Site Hedge Baseline’ I disagree about the ‘Strategic Significance’ categorisation of Hedge number 3 and 4 (‘LOT2’ and ‘LOT3’) within the Statutory Metric. I believe these tree-lines have been under recorded, listed as low strategic significance when they should be listed as medium strategic significance. Both treelines have multiple mature oak trees. According to the UK Habitat Classification Version 2, Essential Secondary Code List, code 34 Ecologically Valuable Line of Trees; a line of trees with more than one mature tree per 30m length is classified as Ecologically valuable, therefore should be listed as ‘Location is ecologically desirable but not in local strategy’.

Additionally, within the Biodiversity Net Gain Assessment, ‘Table 1: Baseline Biodiversity Value’ states the treelines LOT2 and LOT3 as medium Strategic

Significance, therefore the Statutory Metric and Biodiversity Assessment do not match. Furthermore, there is confusion between the number of dwellings to be erected, the Biodiversity Net Gain Assessment states *"The assessment was required to inform a planning application for the erection of three detached two storey dwellings with associated parking, landscaping and open space.."*. However, Appendix 4: Proposed Habitat Plan, shows five new dwellings.

A revised iteration of the metric addressing the above concerns needs to be submitted prior to determination so the local planning authority can agree a baseline at the point of determination.

Based on The Statutory Metric tool and Biodiversity Net Gain Assessment provided, it is possible to discern the strategy that this development proposes to achieve the statutory requirement for a 10% net gain in habitat and hedgerow units. A large proportion of the net gain is due to the on-site creation/planting of 15 small native trees in moderate condition. To ensure the proposed trees are maintained in moderate condition for 30 years, details of management and monitoring will need to be secured through a Habitat Management and Monitoring Plan (HMMP). I recommend a planning obligation is applied to secure monitoring of the proposed biodiversity on-site net gain measures as agreed in the HMMP.

Great Crested Newts:

The Preliminary Ecological Appraisal and Preliminary Roost Assessment 28/04/2024 lists the Application Site as within a green zone for great crested newts. According to the NatureSpace Impact Risk Zones, the Application Site is within a red zone and NatureSpace will require consultation.

Reptiles:

I am in agreement with the application ecologist that there is a likelihood for commuting reptiles within the Application Site and further surveys would be disproportionate. However, I do believe that this Application Site is connected to land that contains arable margins which are known to have commuting and foraging reptiles. All native reptile species are legally protected under the Wildlife and Countryside Act 1981 and are listed as priority species under Section 41 of the Natural Environment and Rural Communities Act 2006. Therefore, native reptiles are of relevant importance to the Wokingham Local Development Framework 2010, Policy CP7 and to the Wokingham Borough Development Plan, Policy TB23. To ensure the favourable conservation status of these species a more comprehensive strategy will be required detailing mitigation procedure for this species. The mitigation strategy provided within the Preliminary Ecological Appraisal and Preliminary Roost Assessment is inadequate to maintain favourable conservation status (FCS).

I accept that full details of a mitigation strategy to maintain FCS could be resolved via a condition attached to the development. Therefore, I recommend a Construction Environmental Management Plan Condition, to encompass mitigation measures for a number of matters to ensure they all work together.

Bats:

I am of the view that the survey evidence provided is insufficient to conclude likely absence of bats. The dwellings were listed as low potential, however, four of the dwellings show up to four potential features, with the number of features as a whole and the Application Site situated close corridors. I am of the view that the Application Site should have been surveyed as 'moderate potential'. Therefore, the Application Site should require a further emergence survey to provide sufficient evidence of presence/absence.

However, based on the features and the survey evidence provided, it is possible to consider a worst-case scenario for bats and their roosts. If a roost is present, the survey evidence so far indicates it would most likely be a day roost of brown-long eared, pipistrelle or soprano pipistrelle. On the basis that there is scope for compensation bat roosts to be provided within the replacement dwellings, I can recommend that a destructive licence is not unlikely to be granted by Natural England, if a day roost of common bat species were to be present.

On this basis, I can recommend that, rather than requiring a further emergence survey, the local planning authority could accept that favourable conservation status of a protected species could be maintained through a combination of:

- a) a detailed mitigation strategy based on a worst-case scenario, to be secured by a CEMP condition, and
- b) a species compensation and enhancement condition securing detailed compensation measures of at least two bat boxes per dwelling. Recommended bat boxes include the Bat Ridge Roost and Habitat bat Boxes.

Hedgehog:

The application ecologist notes that the Application Site provides suitable foraging and commuting habitat for hedgehogs, of which I agree. However, does not list any biodiversity enhancement opportunities for this species. Policy TB23: Biodiversity and Development, 2c stipulates that all new developments should be ecologically permeable through the provision of wildlife corridors. To ensure permeability of this site for hedgehogs, I recommend that a detailed ecological permeability plan, relevant for hedgehogs, is secured as part of the above recommended species compensation and enhancement condition.

Protected Species

The proposed development has raised concerns regarding its potential impact on protected species, these species include bats, reptiles and hedgehog. All other protected species listed within the Preliminary Ecological Appraisal and Preliminary Roost Assessment do not pose any concerns.

Conditions & Reasons (if required)**Construction Environmental Management Plans (CEMP):**

Condition: No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
 - g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
 - h) Use of protective fences, exclusion barriers and warning signs. The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority

Reason: To ensure mitigation measures for protected and priority species are appropriate and secured by local plan policy CP7 and TB23.

A Habitat Management and Monitoring Plan (HMMP)

A HMMP shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the development. The content of the HMMP shall include the following.

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organization responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The HMMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the HMMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To secure appropriate management for the on-site habitats in order to deliver the mandatory biodiversity net gain targets.

Species Compensation and Enhancement Condition

Condition: Prior to construction, a scheme for ecological permeability and biodiversity compensation and enhancement, such as the incorporation of two permanent bat roosting feature(s) per dwelling and access points for hedgehog to gardens, shall be submitted to and agreed in writing with the Local Planning Authority. The approved details thereafter shall be implemented, retained and maintained for their designed purpose in accordance with the approved scheme. The scheme shall include, but not limited to, the following details:

- a) Description, design or specification of the type of feature(s) or measure(s) to be undertaken;
- b) Materials and construction to ensure long lifespan of the feature/measure
- c) A drawing(s) showing the location and where appropriate the elevation of the features or measures to be installed or undertaken.
- d) When the features or measures will be installed within the construction, occupation, or phase of the development.

Reason: To ensure the development is policy compliant with regards to Policy TB23: Biodiversity and Development of the Wokingham Borough Development Plan.

Date:	12/09/25	Signed:	Louise Aparo
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