
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251712
Address:	Land south of Wistaria Cottage, Church Lane and East of Basingstoke Road, Three Mile Cross.		
Proposal:	Full application for the proposed erection of a new single storey detached garage following demolition of the existing garage.		
Type of Development:	Minor All other developments		
Site Visit Made:	No		

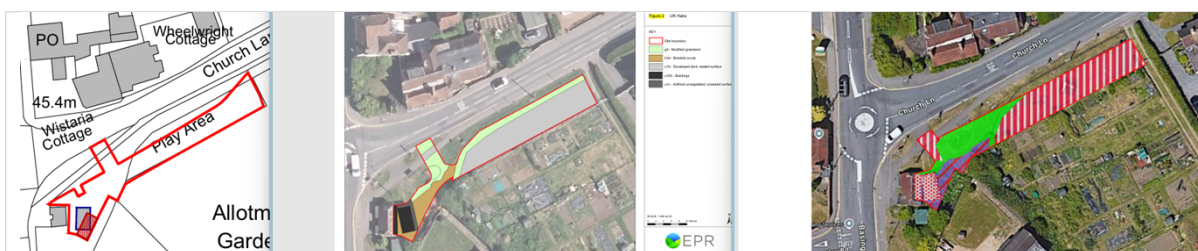
Summary Of Recommendations

- ☐ 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

Further to my previous comments I have reviewed the Biodiversity Net Gain Report (ACD Environmental, Ref TWWL25194_EcIA, 13 July 2026) and reviewed the Biodiversity Metric.

ACD Environmental acknowledge that the development is not exempt from statutory biodiversity net gain. I agree broadly with the results of the metric calculation and asset out in section 5 and 6 of the of the Biodiversity Net Gain report. However, it is not clear that ACD have been provided with ERP's Update Ecological Appraisal. The area of g4 modified grassland assessed by ACD is smaller the area assessed by ERP and extends along the length of the playground hardstanding to the eastern boundary of the site. The area of modified grassland is not consistent in either the Ecological Appraisal Figure 2 or the BGN Report Baseline Habitat Map with the boundary of the Site Area shown in the Location Plan. Provided that the ecologist can confirm that the modified grassland area is not less than 119.65m² I accept that the Site Area has a baseline of 0.04 biodiversity units. Post development up to 0.05 biodiversity units could be created; a net change of 0.01 habitat units (22.21%). I believe the land between the garage and the barn is likely to be managed as private garden by the owner of Wisteria Cottage. Therefore, the Ecologist appears to assess the area of created modified grassland to be larger than can be achieved within the area with public access.



The proposed development does not satisfy the BNG trading rules for the loss of bramble scrub and this will require on-site compensation such as incorporating native shrub planting within the redline Site Area or off-site compensation registered biodiversity gain land or purchase of units from marketplaces or Wokingham Borough Council. When calculating the post-development biodiversity value of a habitat, the planning authority can only take into account an increase in post-development biodiversity units where the LPA is satisfied that the habitat creation or enhancements delivering the increase will be maintained for at least 30 years post completion. In this case this must be secured either by a planning condition or S106 planning obligation as off and on-site compensation have been proposed by the ecologist.

I am satisfied that the that the garage is currently unlikely to support bats. The barn has at least low suitability for bats. To damage to the barn and bat roost it may support and impacts to foraging bats and to breeding birds during tree works, vegetation clearance, site set-up, demolition and construction submission and approval of Construction Environmental Management Plan (Biodiversity) to protect retain scrub, breeding birds and potential roosting features and bat that may be resting in the barn should be secured by condition.

Summary

A baseline of 0.04 biodiversity habitat units can be agreed and a biodiversity gain plan and landscape management plan to ensure at least 10% biodiversity gain can be secured and on and off-site compensation will be maintained after completion. To ensure retained trees and scrub and wildlife including bats, amphibians, reptiles and breeding birds are not impacted during clearance, construction and compensation scrub habitat is provided landscaping planting and a CEMP biodiversity plan should be secured.

Conditions & Reasons (if required)

Condition: The Biodiversity Gain Plan shall be prepared in accordance with the Biodiversity Metric dated 1 June 2006 and Biodiversity Net Gain Report dated 13 July 2026 prepared by ACD Environmental.

The Biodiversity Gain Plan must include:

- information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;
- the pre-development biodiversity value of the onsite habitat;
- the post-development biodiversity value of the onsite habitat;
- any registered offsite biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development;
- any biodiversity credits purchased for the development; and
- any such other matters as the Secretary of State may by regulations specify.

Reason: To ensure that biodiversity net gain is achieved. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: Prior to commencement of development there shall be submitted to and approved in writing by the local planning authority a scheme of landscaping, which shall specify grassland seed mix, and species, planting sizes, spacing and numbers of trees/shrubs to be planted, and any existing trees or shrubs to be retained. Planting shall be carried out in accordance with the approved details and with the Biodiversity Gain Plan

No occupation of the garage shall take place until:

- a. the creation of modified grassland works set out in approve Biodiversity Gain Plan and the tree and shrub planting in the scheme of landscaping and the approved landscape management plan have been completed; and
- b. a completion report, evidencing the completed habitat enhancements, has been submitted to, and approved in writing by the Local Planning Authority.

Any trees or plants which die within a period of 30 years from the date of the planting (or within a period of 30 years of completion of the development in the case of retained trees and shrubs), or are removed or become seriously damaged or diseased, shall be replaced in the next planting season with others of similar size and species or otherwise as approved in writing by the local planning authority.

Reason: To ensure adequate planting in the interests of wildlife and biodiversity and the planning authority is satisfied that the habitat creation will be maintained for at least 30 years post completion. TCPA Schedule 7A, NPPF 2024, and Local Plan Core Strategy policies CP3 and CP7 Managing Development Delivery policy TB23.

Condition: Prior to the commencement of the development a landscape management plan, shall be submitted to and approved in writing by the local planning authority. The landscape management plan shall include habitat condition targets, management responsibilities, all landscape areas (other than privately owned domestic garden).

- c. the roles and responsibilities of the people or organisation/s delivering the landscape management plan;
- d. timescales and maintenance schedules for the planned habitat creation to create to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan and soft landscaping scheme;
- e. the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan and the habitat condition targets for a period of not less than 30 years from the completion of development; and
- f. the monitoring methodology and frequency in respect of the created habitat to be submitted to the local planning authority.

The created habitat specified in the approved LMP shall be managed and maintained in accordance with the approved LMP.

Reason: The planning authority be satisfied that the habitat creation will be maintained for at least 30 years post completion. TCPA Schedule 7A, NPPF 2024, and Local Plan Core Strategy policies CP3 and CP7 Managing Development Delivery policy TB23.

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.

- g. Risk assessment of potentially damaging construction activities.
- h. Identification of “biodiversity protection zones”.
- i. 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).
- j. The location and timing of sensitive works to avoid harm to biodiversity features.
- k. The times during construction when specialist ecologists and/ or arboriculturists need to be present on site to oversee works.
- l. Responsible persons and lines of communication.
- m. Use of warning signs and construction exclusion zone tree protection fencing erected and maintained in accordance with BS5837:2012.

The approved CEMP shall be adhered to and implemented throughout all works strictly in accordance with the approved details.

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals throughout the time that the development is being carried out. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: At no time shall external lighting be installed on the site or affixed to any buildings on the site without the prior written approval of the local planning.

Reason To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 198 and Section 15, Local Plan Core Strategy policies CP3 and CP6 / CP11 and Managing Development Delivery policy TB23.

Informative: Bats are a protected species under the Conservation of Habitats and Species Regulations 2017 (as amended). Should any bats or evidence of bats be found prior to or during the development, all works must stop immediately and an ecological consultant contacted for further advice before works can proceed. All contractors working on site should be made aware of the advice and provided with the contact details of a relevant ecological consultant.

Date:

29/07/26

Signed:

T Cuss