

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	250516
Address:	78 Barkham Ride, Finchampstead, Wokingham, RG40 4ET.		
Proposal:	Outline application for the proposed erection of 1 no. detached four bedroom dwelling with associated landscaping, following demolition of outbuildings and part demolition of the existing double garage of no. 78 Barkham Ride. (All matters reserved except for means of access.)		
Type of Development:	Minor Dwellings (1-9)		
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

I have reviewed the Small Sites Metric (Mike Marlow, 27 February 2025) BNG Baseline Plan, (Dwg BR/005) and Preliminary Roost Assessment (John Wenman Ecological Consultancy, Ref R2912_PRA_a. I have also reviewed the Planning Statement, Tree Impact Plan (Wood's, Ref TIP/003, 14 March 2025) and other plans submitted in support of the application.

Biodiversity Net Gain

The Tree Impact Plan fails to include any details of the hedgerows along the access drive. The Arboriculturist has not assessed the hedge condition or justified removal. According to the SSM all 20m of native hedgerow along the access will be lost which the architect calculates to be 0.08 hedgerow units. While the Planning Statement and BR/005 propose removal of the car park Leylandii hedge, the loss of 10m of non-native hedgerow is not recorded in the SSM. Confirmation is needed whether the 284.86m² of individual urban trees recorded in the SMM include blue-line land which should not have been included in the metric.

No information is provided in TIP/003 to justify the removal of 2 apple trees in accordance with BS5837:2012 guidelines and local planning policy. While loss of hedgerow in the site red-line boundary would not affect the biodiversity baseline value, I note the loss 10m of non-native hedge on the northeast side of the proposed

dwelling shown on drawing BR/005 is not recorded in the SSM. The Hedgerow and Treelines sheet indicates that 43m on non-native hedge will be retained. The Headline Results therefore appear to incorrectly state that there will be 0.113 post hedgerow development units

For the above reasons I am not satisfied that the SMM has been completed accurately by a competent user. I cannot therefore recommend agreeing the baseline habitat and hedgerow unit values. The first principle of The Small Sites Metric User Guide (DEFRA July 2024) is that the SSM assessment should be completed by a competent person. While the competent person does not need to be an ecologist, they should be competent in identifying:

- habitats present on site (pre-development), and
- management requirements for habitats to be created or enhanced within the landscape design (post-development).

To agree the baseline, I request that either a Small Sites Metric or Statutory Metric completed by a competent person in line with the relevant DEFRA user guide.

Planning Statement paragraph 3.10 states: *“it is accepted that unless the proposed dwelling is progressed as a self-build project it will be subject to achieving a 10% biodiversity net gain required by Central Government policy”*. If when a baseline value has been agreed by the LPA, the application is approved, and the applicant is not able to prove that the development will be a self-build, off-site compensation secured by a biodiversity net gain condition and/or S106 legal agreement. I recommend the applicant considers submitting a biodiversity gain plan with the revised application. Off-site biodiversity gain cannot be secured by condition, I would welcome the including of S106 Heads for Terms.

Bat Roost Assessment

I am satisfied that the PRA survey method and effort are adequate for the Ecologist to conclude that the buildings are all currently of negligible potential suitability for roosting bats. The development proposals are considered highly unlikely to result in the death, injury or disturbance of bats; the damage or destruction of a bat roost; or the obstruction of access to a bat roost. The Ecologist states that the linked private gardens with mature trees resemble continuous habitat that could be used as flight paths connecting to high-quality foraging habitats for any bats roosting locally. The impact of the proposal on foraging and commuting bats and proposals for external lighting are not assessed in the PRA or Planning and Design & Access Statement.

I note paragraph 1.1.5 states that bats are mobile species and the survey information in the PRA is likely to be valid for less than 12 months. If the application is approved a resurvey condition in accordance with BS42020 D.5.2 should be imposed.

I am happy to provide further comments when an ecological assessment and justification for the removal of trees shrubs and hedgerows proposals have been submitted. To protect breeding birds and foraging and commuting bats mitigation measures including a Construction Environmental Management Plan and ecological enhancements should be proposed to ensure wildlife is maintained and enhanced

in line with local plan policies, CP1, CP3, CP7 and MDD TB23 and section 15 of the NPPF.

Conditions & Reasons (if required)

Awaiting a revised SSM or Statutory Metric completed by a competent ecologist and preliminary ecological appraisal and mitigation strategy.

Date:	07/05/25	Signed:	T Cuss
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