

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	260117
Address:	Manor Farm, Longwater Road, Finchampstead, Wokingham, RG40 3SE.		
Proposal:	Full application for the proposed conversion of barn to 3no. residential dwellings and associated changes (C3).		
Type of Development:	Other Change of Use		
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 in support for this application;

- Preliminary Roost Assessment, 25th February 2026, Revision Final by Cherryfeild Ecology.
- Planning Statement, 8th January 2026 by ET Planning
- Location and Site Plan, date unknown, Rev A by Jake Underwood.
- Proposed Foul Water Drainage Layout, November 2025, Issue 2 by GeoSmart

Statutory Biodiversity Net Gain

Under the Environment Act 2021, developments in England are required to deliver a minimum 10% measurable increase in biodiversity value compared to the pre-development baseline unless exempt.

Developments which are exempt from BNG are not required to provide a 10% net gain. This development has submitted that it is exempt on the basis that less than 25m² of habitat is impacted.

However, the submitted drainage strategy indicates that grassland and a yew hedgerow are present on site. Additionally, the drainage strategy when overlaid with the 'Site Plan – Proposed shown hatched', it indicates that 155m² of habitat will be required to be removed to create the proposed vegetated gardens. Therefore, the proposal is not exempt from BNG and will be required to provide a Small Sites Metric and BNG assessment.

Protected Hedgerow

Countryside hedgerows may be protected under the Hedgerows Regulations 1997. Under this legislation, a hedgerow is considered “important” (and therefore protected) if it meets specific criteria, including being more than 20 metres in length, located on or adjacent to land used for agriculture or forestry, and satisfying at least one of the historical or ecological importance criteria (for example, forming part of a boundary that has existed since before 1850).

Review of the site using GIS mapping tools and historic mapping (National Library of Scotland) indicates that the hedgerow present on site has been established since at least 1830 and is of sufficient length, and therefore meets the criteria of an “important hedgerow” under the Regulations.

Although the hedgerow is fragmented and its function as a continuous wildlife corridor has been reduced, it still represents a remnant habitat of ecological value. It provides an important stepping-stone feature, contributing to connectivity between open landscapes and an ancient tree corridor to the west, and lowland mixed deciduous woodland to the east. The removal of this section would further erode habitat connectivity, leaving no functional corridor between these areas.

The current layout is not considered to comply with Policy CP7 (Biodiversity) of the Wokingham Core Strategy, which requires that development proposals resulting in harm to features of major ecological importance, including wildlife corridors (directly or indirectly), clearly demonstrate that the need for the development outweighs the need to safeguard nature conservation, and that appropriate mitigation or compensation measures can be secured. Given the apparent age and established nature of this hedgerow, it is unlikely that adequate compensation could be achieved to offset its loss. In addition, Wokingham Borough Development Plan, Policy TB23, paragraph C states development is to remain ecologically permeable through the protection of existing corridors and the provision of new corridors. Should this hedgerow be removed, ecological permeability will be greatly reduced and replaced instead with vegetated gardens and closed board fencing.

Furthermore, the National Planning Policy Framework (Chapter 15) emphasises the importance of protecting and enhancing ecological networks, including wildlife corridors and stepping-stone habitats. As currently proposed, the layout fails to appropriately conserve these features and is therefore not compliant with both local and national planning policy.

Therefore, it is recommended that the site layout be revised to avoid impacts to the on-site hedgerow.

Protected Species

Bats

All bat species and their roosts are protected under UK and European legislation, including the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. These laws make it an offence to kill, injure, capture, or disturb bats, or to damage or obstruct access to their roosts. Several bat species are also listed as priority species under the NERC Act 2006.

A Preliminary Roost Assessment (PRA) has been submitted which classifies the buildings on site as having negligible potential for roosting bats. This is supported by appropriate justification and photographic evidence, and it is agreed that the structures lack suitable features, access points, and materials to support roosting bats.

However, the applicant's ecologist correctly identifies that lighting on trees and hedgerows has the potential to impact foraging and commuting bats. As outlined above, the on-site hedgerow likely functions as a stepping-stone feature and may represent the only remaining commuting corridor within the current landscape, connecting habitats to the west and east. Bat records from TVERC confirm that bats have been recorded foraging within the north-eastern part of the site as recently as 2024, indicating the wider site supports bat activity.

A sensitive lighting design will therefore be required to ensure that artificial lighting does not adversely affect commuting routes or foraging behaviour, particularly in relation to the hedgerow (subject to its retention). A Lighting Design Strategy for Light-Sensitive Biodiversity should be secured by condition. This should detail the location, type, and specification of all proposed lighting and be prepared in accordance with Bat Conservation Trust Guidance Note 08: *Bats and Artificial Lighting*, ensuring light levels are minimised to reduce ecological disturbance.

Breeding birds

The applicant has not submitted a preliminary ecological appraisal to outline other protected species that may be impacted by this development. If the LPA is likely to approve this development, and thus the hedgerow removal, a breeding bird condition will be required to ensure wild breeding birds are not impacted by this development. Wild breeding birds are protected under the Wildlife and Countryside Act 1981, making it a criminal offence to remove, damage or destroy the nest of any wild bird and their eggs. Therefore, to comply with national legislation the condition will be required to secure no harm to breeding birds.

Biodiversity Enhancements

Chapter 15 of the National Planning Policy Framework (NPPF) and the Wokingham Borough Development Plan require development proposals to deliver measurable biodiversity benefits through building layout, design, or landscaping.

In order to comply with national and local policy, the applicant's ecologist has recommended the incorporation of bat box within the fabric of the proposed dwelling. As no specific quantities have been set out, it is considered reasonable and proportionate to require the installation of one bat box and one bird box.

The applicant ecologist does not provide any recommendations for other species such as hedgehogs. Hedgehogs are a priority species under the UK Biodiversity Action Plan, which forage and commute within urban and rural landscapes. Wokingham Borough Development Plan, Policy TB23 stipulates that new developments are required to be ecologically permeable through the protection of existing and provision of new wildlife corridors, as previously discussed. If the LPA is minded to approve this development, hedgehog highways, which are gaps

measured as 13cm x 13cm, will be required in any closed board fencing to allow for permeability across the site.

To ensure delivery of these biodiversity enhancements, it is recommended that a Species Compensation and Enhancement condition is attached to any grant of planning permission.

Conditions & Reasons (if required)

Lighting design strategy for light-sensitive biodiversity – Condition

Prior to occupation, a “lighting design strategy for biodiversity” for buildings, features or areas to be lit shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a. identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b. show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority

Reason: To policy compliance with national legalisation Wildlife and Countryside Act 1981, Conservation of Habitats and Species Regulations 2017 and Wokingham Core Strategy, Policy CP7.

Protection of Breeding Birds During Construction Condition

No removal, planting or impact of hedgerows and trees shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds’ nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure this protected species is not impacted by the development and in keeping with national legislation Countryside and Wildlife Act 1981.

Species Compensation and Enhancement Condition

Condition: Prior to construction, a scheme for ecological permeability and biodiversity compensation and enhancement, such as the incorporation of one permanent bat roosting feature(s), bird box 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:	14.05.26	Signed:	L.Aparo
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