

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	252934
Address:	Land at Lodge Road, Hurst, Wokingham, RG10 0SG.		
Proposal:	Full application for the proposed erection of 3 no. detached dwellings with associated access, parking and landscaping and creation of a balancing pond.		
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 submitted in support of this application and reviewed;

- Preliminary Ecological Appraisal, February 2025 by AKB Ecology
- Biodiversity Net Gain Assessment, October 2025 by AKB Ecology
- Arboricultural Impact Assessment, Appendix A Plan, September 2025 by GHA Trees
- BS5837:2012 Tree Survey and Arboricultural Impact Assessment, September 2025 by GHA Trees
- Planning Support Statement, November 2025 Ben Cornwell Chartered Town Planners.

Biodiversity Net Gain

The applicant is required to deliver a minimum 10% biodiversity net gain, as mandated by the Environment Act 2021.

A Preliminary Ecological Appraisal (PEA) and a Biodiversity Net Gain (BNG) Assessment have been submitted, and both documents are consistent in identifying modified grassland as the baseline habitat. However, the baseline cannot be verified. The BNG Assessment refers to a separate grassland survey report and condition assessment sheets, but these have not been provided.

Without the grassland survey and condition sheets, it is not possible to confirm the habitat condition or understand the justification for the condition categories applied.

This is particularly important because the BNG Metric identifies four different types of modified grassland with varying condition scores, whereas the submitted reports only describe modified grassland in general terms.

Until the missing grassland survey and condition assessment sheets are submitted, the baseline position cannot be determined and the BNG calculation cannot be validated.

The submitted biodiversity metric does present a post-development scenario. While it is not appropriate at this stage to approve the detailed habitat proposals, a significant proportion of the onsite habitat units are attributed to the enhancement of woodland and modified grassland to neutral grassland and the creation of mixed scrub and non-priority pond. To ensure the proposed habitats are managed 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

Protected Species

Bats

All bats and their roosts are legally protected by national and European legislation including Wildlife and Countryside Act 1981 and Conservation of Habitats and Species Regulations 2017. Additionally, several species of bats are a priority species under the NERC Act 2016. These legislations make it illegal to deliberately disturb a bay, capture/kill or injure a bat or disturb a breeding or resting site.

The applicant ecologist indicates that rural single standing trees in the middle of the site offer negligible potential for roosting bats, from the images provided, I agree with this assessment. However, the applicant ecologist hasn't categorised the roosting potential of the boundary trees on site or the flight routes and foraging potential of the site, as required in the Bat Conservation Trust guidelines.

The site contains tree lines to eastern and western boundaries with young treelines to the north. The applicant ecologist does not provide a categorisation of potential for the roosting features of the trees within the treeline, nor a an activity and foraging potential, which deviates from best practice guidelines. However, I can agree with the ecologist that the development would not cause harm as an approx. 16m buffer from the development to the suitable foraging and flights routes on site.

However, despite the buffer zones, the height of the buildings, when combined with integrated lighting positioned at higher wall levels, has the potential to illuminate a larger area. This could disrupt commuting corridors and negatively impact light-sensitive species, therefore a sensitive lighting plan will be required. The purpose of this plan is to ensure that artificial lighting does not adversely affect the surrounding treelines, scrub or woodland. These areas are likely to support a range of nocturnal and diurnal European Protected Species, such as bats and badgers, as well as species of principal importance including certain invertebrates and hedgehogs. The lighting plan should therefore maintain a dark corridor along the western edge of the site and adjacent treelines to minimise ecological disturbance.

The sensitive Lighting Plan should detail the location, type, and specification of all proposed lighting. This plan should follow the *Bat Conservation Trust Guidance Note 08: Bats and Artificial Lighting*. It is recommended that a Lighting Design Strategy for Light-Sensitive Biodiversity condition be required to secure details of the lighting plan.

Badgers

Badgers are a European Protected Species and are legally protected under the Protection of Badgers Act 1992 and the Wildlife and Countryside Act 1981. It is therefore an offence to harm badgers or to damage, destroy, or obstruct access to their setts. The applicant's ecologist undertook a badger survey of the application site and a 30-metre surrounding buffer. Foraging evidence in the form of snuffle holes was recorded on site. In addition, both internal records and data from the Binfield Badger Group confirm the presence of a badger sett adjacent to the development area, and the applicant's ecologist also identified a sett approximately 30 metres from the site boundary.

Given the confirmed local presence of badgers, preventive mitigation is required in accordance with national policy to ensure the species is safeguarded from harm. A precautionary working method statement for badgers must be incorporated into the Construction Environmental Management Plan (CEMP). Furthermore, a pre-commencement badger survey, undertaken no more than three months prior to the start of works, is necessary to confirm the continued absence of badgers or active setts within the working area. I recommend securing this requirement through an appropriate planning condition.

Amphibians and reptiles

The applicant's ecologist has identified that the site has potential to support foraging and hibernating amphibians and reptiles. An egg and torch survey was undertaken, however, this was very early in the breeding season, therefore the absence of amphibians or eggs cannot be relied upon. Reptiles were also likely still in hibernation at the time of survey, and several on site features such as treelines, long grass margins and ditches provide suitable hibernation and foraging habitat.

As these key habitat features will be retained, and only short sward, sub optimal grassland will be lost, the ecologist has recommended precautionary working methods in place of further presence/absence surveys for reptiles. These measures include maintaining short sward grassland, undertaking vegetation clearance between March and September, and removing topsoil under the supervision of an Ecological Clerk of Works. These precautions are appropriate to safeguard protected and priority species and are consistent with Wokingham Core Strategy Policy CP7: Biodiversity. The precautionary working methods are to be secured as apart of the CEMP condition.

All other protected species considerations can be addressed through the CEMP condition.

Biodiversity enhancements

To comply with the Wokingham Borough Development Plan, Policy TB23: Biodiversity and Development; paragraph a) all developments are to provide

opportunities through design, layout and landscaping to incorporate new biodiversity features or enhance existing. Additionally, paragraph c) states that developments should be ecologically permeable through the provision of wildlife corridors.

The application ecologist has suggested a variety of enhancements that would benefit wildlife and support the Wokingham Action Plan. These enhancements include the following;

- 2 bat boxes (on retained trees or integrated into dwellings)
- 2 bird boxes (on retained trees or integrated into dwellings)
- Reptiles and amphibian hibernaculum
- Stag beetle log pile
- Hedgehog highways
- Solitary bee bricks.

The enhancements, recommended within the BNG Assessment report are all appropriate enhancements for species present on the site. I recommend securing all enhancements with a Species Compensation and Enhancement condition. The Species compensation and enhancement document should include implementation details and details of where these enhancements are to be located.

Conditions & Reasons (if required)

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.

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.

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 legislation Wildlife and Countryside Act 1981, Conservation of Habitats and Species Regulations 2017 and Wokingham Core Strategy, Policy CP7.

Pre-commencement: Ecology updated surveys

No development and groundworks shall take place until an updated ecological survey for badgers has been undertaken, and a report submitted to and approved in writing by the Local Planning Authority. The survey shall be undertaken no more than three months prior to the commencement of development. The report shall detail the methods, results and a discussion on the survey, and include recommendation measures for any working practices or other mitigation measures.

Reason: In accordance with the National Planning Policy Framework and to comply with the Badger Protection Act 1992, the Wildlife and Countryside Act 1981 and the Wokingham Core Strategy, Policy CP7: Biodiversity to protect priority species.

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), two bird nesting features, a reptile hibernaculum, stag beetle log pile, solitary bee bricks 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:

Signed: