

MEMORANDUM

From:	Tina Cuss Ecology Officer	To (Case Officer):	Kieran Neumann
Service	WBC Ecology	App No:	242913
Address:	Berks County Sports Club, Sonning Lane, Sonning, Wokingham, RG4 6ST.		
Type of Development:	Minor All other developments		
Proposal:	Full application for proposed erection of 3no. covered padel tennis courts and 3no. outdoor tennis courts with associated flood lighting, parking and club huts.		
Site Visit Made:	No		

Summary Of Recommendations

- ☐ Recommend approval but with condition(s) & reason(s) **stated below**;
- ☐ Recommend approval with no conditions
- ☐ Recommend refusal for the reason(s) **stated below**;
- ☒ **Negotiate the amendments stated below; or**
- ☐ Request further information before determination as **stated below**.

Comments On Proposal

I have read Design Statement Rev P1 (November 2024), Biodiversity Net Gain Assessment (Arbtech, 13 January 2025), Preliminary Ecological Appraisal (PEA - V2 - 19.11.24.pdf and Artificial Lighting Impact Assessment (PEC, Ref 1rL10175, 20 December 2024) and assessed the Statutory Biodiversity Metric, Proposed and Baseline Condition Assessment (Arbtech. I have also reviewed the covering letters and submitted plans and elevations.

Artificial Lighting Impact Assessment

I do not consider that district brightness category E3 proposed in paragraph 4.1.2 is appropriate. The access track which is part of the application site is within the Sonning Conservation Area and would be impacted by lightspill proposed. MDD policy TB24 states the Council will seek conservation and enhancement of heritage assets and their settings by requiring proposals demonstrate works would at least conserve and where possible enhance Conservation Areas including its setting and views. The Conservation Area Appraisal states that the village has a modest public lighting scheme. *"Any attempt to replace or expand the current provision of street lighting would need to be subject to close scrutiny so as to preserve or enhance character"*. I request that the Table 5 is revised, the Artificial Lighting Assessment is not approved and the site and is treated as a sparsely inhabited rural areas, village or relatively dark outer suburban locations or uninhabited rural area.

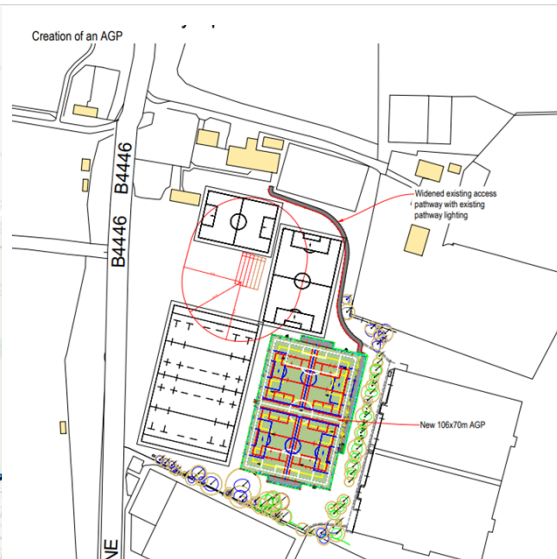
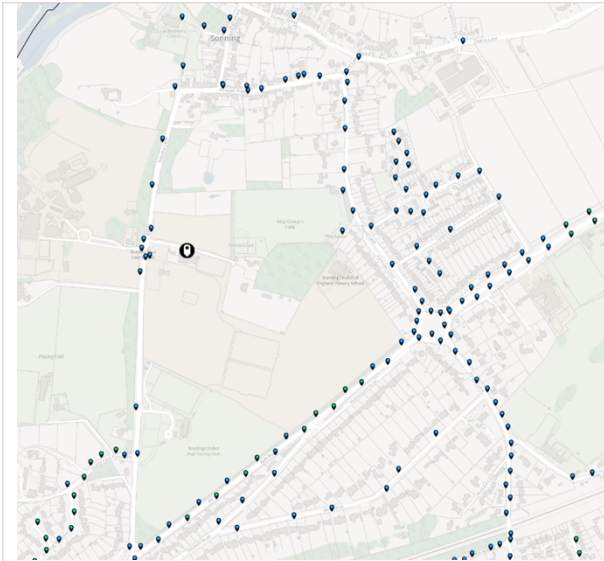
The guidance cited in section 2 of the Artificial Lighting Impact Assessment is out of date and doesn't include Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23. Policies CP7 and MDD TB33 are not referred to in Section 2.1 which the Engineer reviewed to find planning policy relating to artificial lighting. The NPPF 2023 states that planning decisions should: *"also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: ..c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation"*.

The ALIA failed to highlight CP3 c) or d) and overlooked that the lighting proposed must not have a detrimental impact upon important ecological and should maintain or enhance the ability of the site to support fauna and flora including protected species.

ALIA Figure 2 shows only 3 off-site ecological sensitive receptors. The ecological receptors don't include any of the necessary boundary habitats and the Conservation Area. The Preliminary Ecological Appraisal (PEA) assessed the grassland and species rich hedgerow with trees habitats recorded on site as providing foraging and commuting opportunities for bats. The Ecologist states *"Most notably, the hedgerow on the site are mature and extend beyond the site adding to the continuity of vegetated linear features present in the wider landscape. Bats are well known to use linear features to aid navigation whilst travelling between foraging resources and roost sites"*. The Ecologist assessed unforeseen impacts stating: *"However, the proposed development will including the use of lighting which could spill on to bat roosting, foraging or commuting habitats and deter bats from using these areas"*.

The ALIA dated December 2024, so I am very concerned that the Lighting Engineer has not been provided with the Ecological Assessment and neither the lighting proposals have failed to take into account the proposal made by the Ecologist that **"a low impact lighting strategy will be adopted for the site during the post-development which outlines the areas of the site that **will be retained as dark corridors**"**. The Ecologist assessed that the hedgerows provide suitable habitat for reptiles, but considered the heavily managed grassland sub-optimal and that reptiles are unlikely to migrate into the development site.

The Preliminary Ecological Appraisal desk top survey does not include a TVERC local records data search and has therefore not taken account of local bat, Great crested newt and amphibian records. The Ecologist has also not considered local planning history including 223824 which provided maps illustrating local bat roost and GNC records that have subsequently not taken into account by Arbtech. European protected Great crested newt recorded within 70m of the proposed courts and there is a GCN breeding pond within 20m of the blue line land. The proximity to [Ali's Pond Local Nature Reserve](#) should have been considered. The Planning Statement refers to AAE undertaking a bat survey in 2020 and not identifying roosts near the courts. The surveys undertake to install the footpath to the south and artificial pitch is not taken into account.



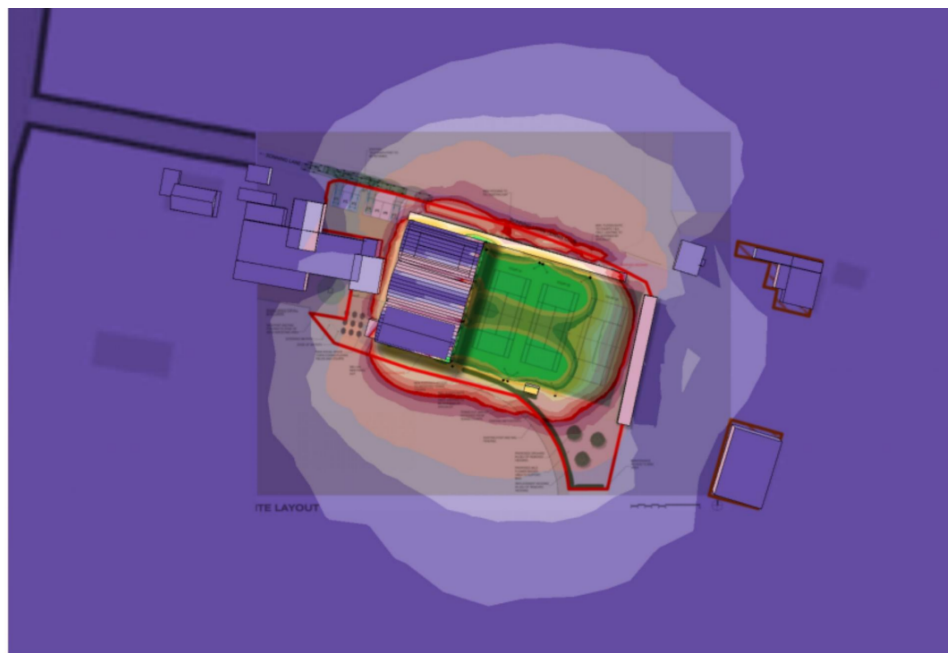
The Ecology Surveys (BJ Collins, December 2022) submitted in support of 223824, assessed that principally due to the extent of halogen floodlit sports pitches surrounding the boundary to the immediate southwest and running parallel to the proposal to the east there was considered to be a low potential for commuting and foraging bats on the site. The Ecology Surveys states that the western boundary of the site runs on the opposite side of the Bluecoat School grounds. This side of the highway provides a habitat corridor (TN2) with connectivity to wetlands further west. The Ecologist's review of aerial imagery identified that the optimal habitat for bat foraging and commuting to the west of the sportsground (ie immediately adjacent and creating a habitat corridor to the padel tennis and tennis courts. An updated PEA and ALIA therefore need to consider in combination and the cumulative impact of the site light pollution and to mitigate the impacts on wildlife.

Hours of Operation

Application 240721 varied 223824 Condition 8 to ensure that the operating hours for the floodlights and floodlight pitch area did not extend beyond 08:00 to 22:00hrs Monday to Friday, 08:00 to 21:00hrs Saturdays and 08:00 to 20:00hrs on Sundays. The Ecologist has not assessed the proposal in order to maintain and enhance wildlife in line with local plan policies CP1, CP3, CP7 and MDD TB23 and NPPF paragraph 198, I request that the application is revised to ensure that the hours of operation and particularly lighting are amended in line with the other sports pitches and parking on the Berks County Sports Club site. I am not satisfied that the lighting proposals take into account the need to maintain dark corridors for bats and amphibians and birds in particular.

I understand permissions 191526 and 193377 secured flood lights at the sports ground could only operate 9.00 -22.00 Monday to Friday and 9.00 to 19.00 Saturday and Sunday, extending the hours of 9.00 to 9pm allowed by the Planning Inspectorate in the appeal of 092047. 201422 approved installation of 15 columns and restricted hours of operation to 9:00 - 21:00 Monday - Friday 9:00 - 19:00 Weekends and Bank Holidays. Condition 11 of permission 223824 imposed to safeguard the residential amenities and ensure that biodiversity, protected and priority species are not adversely affected. It was varied by permission 240721 the 3G Artificial Grass Pitch may only be used between 08:00 and 22:00 hrs Monday to Friday, 08:00 to 21:00hrs Saturdays and 08:00 to 20:00hrs on Sundays.

Appendix 1: Survey/Habitat map



Title
Figure 4
Predicted Lux Level (0m)

Project
Berkshire County Sports Club

Project Number
L10175

Contains Ordnance Survey Data
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PEC

For the above reasons I must object to the proposal for a 23:00 curfew or operation until 22:30 as suggested and any breach of existing hours conditions. In line with all other recent granted planning permissions, I request that the proposed hours of operation and revised lighting assessment are amended to ensure that external lighting and is not in use after 22.00. I support that lighting is proposed to be switched off when not in use and this should be secured by condition in the final lighting strategy.

LANO-CLS-01 Dwg 03 rev 01 Proposed Site Plan shows the widened existing access pathway with existing pathway lighting running to the south of the paddle and tennis courts and south to the artificial pitch along the route shown in the current Topographical Survey Dwg Oak_24-086. The Artificial Lighting Impact Assessment overview of existing lighting in Section 3 of the ALIA states that the surrounding areas is predominantly fields, sports clubs and school grounds and has failed to map the existing or proposed access road and path lighting or asses the light pollution from the existing floodlighting.

In summary, to safeguard wildlife and protected species including birds, nocturnal animals in particular bats in line with the NPPF and CP3, CP7 TB23 and TB24, a revised lighting assessment and detailed lighting proposals and hours of operation should be submitted for the LPA to consider cumulative impact of light pollution on the wildlife and the natural environment.

Preliminary Ecological Appraisal

According to the PEA, the eastern boundary species-rich hedgerow is dominated by blackthorn and hawthorn with Sessile oak, horse chestnut, ash, holly and sycamore. The area to the west of the eastern species-rich boundary hedge is assessed at g3c neutral grassland and flowering species which may support invertebrates for bat foraging include frequent spear thistle, red clover, white clover, ragwort, hawksbit, red campion, lemon balm and mallow. While the grassland is a widespread habitat and was closely mown at the time of the habitat survey, the Ecologist has not considered the impacts of removal of the buffer to the eastern hedgerow and the effects of narrowing the corridor to

I disagree the native beech hedge, particularly on the east side, doesn't pass the B1 and B2 hedge base gap and hedge canopy criterion. The Beech hedges are all wider than 1.5m. The Hedgerow Survey Handbook advises although the 'favourable condition' threshold height is 0.5m, it should be noted that some hedgerow types may naturally lack leafy growth around the base. For hedgerows where this is believed to be the primary, or only, reason for the average height of the base of the canopy being 0.5m or more, a note should be made on the form: such hedgerows are in 'favourable condition' for this attribute. I suggest the condition of the native beech hedges should be assessed at good.

The need for consideration of the Hedgerow Regulations hasn't been assessed and confirmed whether the hedge should be considered important.

Other Neutral Grassland and Hedgerow	Description
Photograph 	Figure 5: Facing south, showing area of neutral grassland, species-rich native hedgerow and beech hedgerow to the east of site 

Contrary to the requirements of MDD TB23 the replacement hedging proposed in lieu of removed hedging does not provide connectivity to suitable bat foraging

habitat and the Great crested newt population in Alis Pond Local Nature Reserve. The neutral grassland and the Beech hedge on the eastern side of the existing courts provided both foraging habitat, a buffer to the species-rich hedgerow, and screening to mitigate for light pollution from the tennis courts and provide a dark commuting and foraging corridor connecting to hedgelines, treelines and woodland and groups of ponds as well as the River Thames to the west. The replacement hedge is proposed adjacent to a lit footpath and doesn't link alternative neutral grassland, hedgerows or treeline and woodlands. In addition to the lack of link to wildlife habitats, it is not clear that there is sufficient space for a species rich hedge to be established on the edge of the 3m path which would not encroach over the path.

TB23 states planning permission for development proposals will only be granted where they comply with policy CP7 and also demonstrate how they:

b) Provide appropriate buffer zones between development proposals and designated sites as well as habitats and species of principle importance for nature conservation.

c) Ensure that all existing and new developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors, which shall be integrated and linked to the wider green infrastructure network.

In order to retain a corridor and buffer on the east of the site and protect and mitigate the impact on the connectivity, bat foraging and wildlife commuting alternative layouts needed to be considered to avoid the loss of neutral grassland buffer and retain a dark corridor along to the eastern species rich hedgerow. The alternative of reducing the number of courts added and expanding if they demonstrate demand rises is not considered. The PEA has not considered translocation of any of the hedges.

For the above reasons to ensure the mitigation hierarchy is used, I request the site layout/design is amended to retain the native hedgerow on the east side of the existing hardstanding and buffer to the eastern species rich corridor. In order to recommend approval of a revised Site Layout Drawing, it must include a legible key.

d)

To demonstrate how the proposed development and lighting scheme will respond to the need to maintain or enhance the ability of the site to support fauna and flora including protected species I request the plans are amended, must demonstrate alternatives which have been ruled out and avoid, mitigate and compensate for indirect and direct impacts on habitats and protected and notable species.

Biodiversity Net Gain Assessment

I would not currently recommend agreeing the hedgerow habitats unit baseline and therefore approving the biodiversity metric.

Conditions & Reasons (if required)

Date:	8/2/25	Signed:	T Cuss
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Figure 2 – Location of bat roost recorded within 1km of the site, shown as blue points. The red polygon shows the



Figure 3 – Location of Great crested newt records within 1km of the site, shown as blue points. The red polygon shows the location of proposed sports pitch.

