

Date: 14 January 2025
Application: 243229



WOKINGHAM
BOROUGH COUNCIL

WBC Ecology

Development Management &
Compliance

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Dear WBC Ecology,

Full Planning Approval Consultation

Application Number: 243229

Applicant: Palatine Homes Ltd

Site Address: 109 Victoria Road, Wargrave, Wokingham, RG10 8AG

Parish:

Grid Reference: Easting - 479260, Northing - 178804

Type of Development: Minor Dwellings (1-9)

Proposal: Full application for the proposed erection of 8no. dwellings following demolition of the existing buildings and structures plus alterations to the existing access.

Case Officer: Marcus Watts

Development Management has received the above application and we require your comments on the proposal using the recommended memorandum below. The documents associated with this are available to view in NEC DM using the application number 243229. Alternatively, public documents are available to view on the Council's planning application search page: [Wokingham Borough Council Online Planning](#).

Please index your response into NEC DM against the application. If you are recommending conditions, you should give a reason with reference to relevant policies. A list of standard conditions can be found on the Z Drive at: [Z:\Standard Planning Conditions](#).

Your observations are required in respect of this application within **10 working days** of the above date or **15 working days** if the development type is classed as a major development.

Yours sincerely,
Development Management & Compliance

MEMORANDUM

From:	Cath Holwill GS Ecology		
Service	WBC Ecology	App No:	243229
Address:	109 Victoria Road, Wargrave, Wokingham, RG10 8AG.		
Proposal:	Full application for the proposed erection of 8no. dwellings following demolition of the existing buildings and structures plus alterations to the existing 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

The application is for the redevelopment of land currently used as Victoria Nurseries to provide a total of eight detached and semi detached properties. The site is surrounded by residential properties with gardens.

Protected Species/Priority Habitats

The ecology report (AAE, December 2024, ref: 243241) concludes that the site is not suitable for bats, amphibians, badgers or other protected species. Habitats on site comprise buildings, unvegetated land, grassland, areas of planting, scrub and shrub and scattered small trees. All trees, scrub and shrub areas will be removed. As such any vegetation clearance should be undertaken outside of the bird nesting season (March to August). This should be secured via planning condition to ensure that birds are not harmed or killed during development works

Biodiversity Net Gain (BNG)

The proposals are subject to mandatory Biodiversity Net Gain under Schedule 7A of the Town and Country Planning Act 1990). The Biodiversity Net Gain report (AAE, December 2024) concludes that the proposals will lead to a net loss of -0.3539 Area Habitat units (equivalent to -37.65%). This is a significant loss for a small area measuring 0.28Ha.

Furthermore, the calculation does not satisfy the trading rules and will result in the loss of -0.1318 Area Habitat Units (AHUs). of medium distinctiveness habitat (primarily due to the loss of the individual trees as and shrub areas) and a loss of -0.2220 AHUs of low distinctiveness habitat.

The Biodiversity Net Gain Hierarchy requires that impacts on valuable habitats are minimised –

and thereafter, that BNG is provided on site before being located off site. The BNG report states that *“the loss in biodiversity will be compensated by off-site replacement habitat through the purchase of habitat units”*.

The Council will need to ensure that all opportunities to preserve and enhance biodiversity on site have been fully explored before relying on off site compensation. They will need to be satisfied that all areas allocated for buildings and hardstanding are essential and that the number of houses on the site is justified and acceptable. It may be possible for example, to reduce the number of houses, or by designing smaller dwellings with larger gardens or minimise the extent of hardstanding areas (for example by reducing areas set aside for parking) – which will help to reduce the large biodiversity loss.

Should the council decide that such a large loss of biodiversity on site is acceptable, it will need to then decide whether offsite provisions to mitigate this loss are appropriate.

Additionally, there appear to be several discrepancies between the accompanying BNG spreadsheet (Small Sites Metric) and other plans submitted

- The arboricultural report shows eight trees to be removed whereas the BNG report shows 11 trees will be removed.
- The BNG spreadsheet includes 16 small trees to be planted whereas the Proposed habitats Plan in the report shows 21 trees (12 along the length of ‘Other Neutral Grassland’ to the north of the site and two within gardens).
- The metric shows an area of Other Neutral Grassland along a strip of land to the north of the site. It is unclear whether this area is a communal area for residents use. If this is a communal area, then it is unlikely to succeed as neutral grassland/wildflower meadow as it will be subject to increased residential recreational pressure and potential pet fouling which will adversely affect the grassland’s condition. It is also very likely there will also be pressure from residents to keep this area neat and in a managed state. Accounting for this area as modified grassland of moderate condition would be more realistic but will lead to a larger net loss of biodiversity of -46.23 % (equivalent to a net loss of -0.4345 AHUs). The applicant should clarify the intended use of this area.
- One of the baseline habitats appears to be incorrect The area to the front of the site is currently shown in the metric as “Artificial Unvegetated land” This appears to be incorrect . as images from Streetview from 2022 onwards show the area should be classified as garden or modified grassland – see photos below:



May 2023



October 2022

Summary:

Our advice is that the application should not be determined until the following information has been provided:

- (a) A review of the development plans including confirmation from the applicant on why all existing trees need to be felled. The applicant should also clarify why garden areas cannot be expanded.
- (b) Correction of the errors in the BNG calculation listed above. Additionally, we recommend that the statutory metric is used rather than the small sites metric

This information should be provided before the application is determined

Conditions & Reasons (if required)

n/a.

Date:	20/2/2025	Signed:	C HOLWILL
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