

# MEMORANDUM

|                             |                                                                                                                                                                                                                                                                                   |                |        |
|-----------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------|
| <b>From:</b>                | Louise Aparo<br>Ecology Officer                                                                                                                                                                                                                                                   |                |        |
| <b>Service</b>              | WBC Ecology                                                                                                                                                                                                                                                                       | <b>App No:</b> | 243207 |
| <b>Address:</b>             | Stanford End Farm, Barge Lane, Swallowfield, Wokingham, RG7 1SY.                                                                                                                                                                                                                  |                |        |
| <b>Proposal:</b>            | Full application for the proposed erection of a single storey extension to the existing dwelling following demolition of existing structures, with landscaping and changes to fenestration, plus the installation of a new sewage treatment plant with associated drainage works. |                |        |
| <b>Type of Development:</b> | Minor All other developments                                                                                                                                                                                                                                                      |                |        |
| <b>Site Visit Made:</b>     | Yes/ <b>No</b>                                                                                                                                                                                                                                                                    |                |        |

## 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 for this application:

Existing Site Plan, October 2022, Drawing no:1101 by Edgingtons Architects.  
Biodiversity Net Gain Assessment, 3<sup>rd</sup> February 2025, Issue: Final 01 by Arbtech  
Proposed Site Plan, October 2022, Drawing no:1101 by Edgingtons Architects.  
Preliminary Ecological Appraisal, 10<sup>th</sup> November 2022, Issue: 2.2 by ArbTech.

### Context

This memo addresses matters relating specifically to Biodiversity Net Gain (BNG). Feedback on protected species was provided separately and is not repeated here.

### Statutory Biodiversity Net Gain

The applicant's ecologist has submitted a Biodiversity Net Gain Assessment. The baseline conditions used in this assessment are derived from the Preliminary Ecological Appraisal and Preliminary Roost Assessment (PEA/PRA) undertaken by Arbtech. The PEA/PRA confirms that habitat surveys were completed on 13 July 2022. These results can no longer be accepted as a reliable baseline, as they are now 3.5 years old, exceeding the recognised validity period by approximately 1.5 years.

There are also inconsistencies between the baseline habitat information in the PEA/PRA and the baseline used in the Statutory Metric Assessment. The PEA/PRA identifies the habitat surrounding the farmhouse as modified grassland, whereas the BNG Assessment categorises the same area as neutral meadow. Although the BNG Assessment states that habitat classifications were updated to align with the UK Habitat Classification System, it does not explain why part of the area remains classified as modified grassland while the remainder is treated as neutral grassland. Given these discrepancies—and the reliance on out-of-date survey data—an updated UK Habitat Classification Survey is required to establish a valid and defensible baseline.

The post-development scenario within the metric and BNG Assessment also classifies the existing trees as “retained.” However, these trees are shown within the footprint of the proposed urban garden, meaning their long-term retention cannot be secured. As such, they cannot be relied upon to contribute to the BNG calculation. To resolve this, the post-development layout should be amended to reduce the extent of the urban garden and ensure the trees are located within a dedicated area of open space where their retention can be guaranteed.

To discharge the statutory BNG obligation, the proposal must demonstrate compliance with the Biodiversity Gain Hierarchy, which requires:

- *first, the avoidance of adverse effects on onsite habitats of medium, high or very high distinctiveness (score of four or more under the statutory metric), and where avoidance is not possible, the mitigation of those effects; and*
- *then, for all onsite habitats adversely affected by the development, compensation should be delivered in the following order of priority: enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains, and finally the purchase of biodiversity credits.*

(Paragraph 008, Reference ID: 74-008-20240214)

In relation to this hierarchy, the proposed development retains the majority of primary habitats, including trees and hedgerows, and the loss of grassland appears unavoidable. However, clarification is required as to why the second parcel of grassland—adjacent to the proposed urban garden—is proposed to remain as modified grassland rather than being enhanced to neutral meadow. A clear justification would help demonstrate alignment with the Biodiversity Gain Hierarchy.

Although the baseline assessment cannot currently be verified due to the age of the survey data, the BNG Assessment indicates that, if permission is granted, the statutory general biodiversity gain condition will apply. A detailed post-development scenario, including any required off-site provision, will therefore need to be secured through the submission of a comprehensive Biodiversity Net Gain Plan.

The submitted biodiversity metric does present a post-development scenario. While it is not appropriate at this stage to approve the detailed habitat proposals—particularly as the submission relies on off-site biodiversity units—a significant proportion of the onsite habitat units are attributed to the attenuation basin and the retained modified grassland. 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

An updated UK Habitat Classification Survey is therefore required to establish an accurate baseline and to provide justification for the proposed retention of modified grassland. Once this information has been submitted, the application will be in a position to progress toward satisfying the statutory Biodiversity Net Gain requirement.

#### **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.

|              |          |                |         |
|--------------|----------|----------------|---------|
| <b>Date:</b> | 06.02.26 | <b>Signed:</b> | L.Aparo |
|--------------|----------|----------------|---------|