

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	261695
Address:	Luckley House School, Luckley Road, Wokingham, RG40 3EU.		
Proposal:	Full application for the expansion of school curtilage into adjacent land and creation of new sports pitches with associated external works		
Type of Development:	Minor All other developments		
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

Biodiversity Net Gain

The applicant's ecologist has submitted a Biodiversity Net Gain Assessment and associated Statutory Metric. I agree with the baseline conditions submitted within the BNG metric.

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 retained urban trees, linear features and 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.

As it's a pre-commencement condition, it can be revised post-determination stage but there is an error between the Arboricultural Impact Assessment (12th August 2025, Tree Surveys) and the Statutory Biodiversity Metric (15th July 2026, John Wenman Consultancy). The metric indicates the hedgerows on site to be retained entirely, meanwhile the Arb Report indicates a reduction in hedgerow G55 Hawthorne to enable the hardstanding on the northern boundary. This error is very

minor and does not drastically impact the net gain score therefore can be revised at condition stage.

Protected Species

Roosting Bats

The Preliminary Ecological Appraisal specifies that although there are mature trees present, there are no visible roosting features. However, the applicant ecologists caveats this statement by specifying that there are mature trees present, which show signs of deadwood and features may not be visible from the ground. Furthermore, if roosts are present, they are most likely suitable for individual bats i.e. PRF-1.

Previous ecological survey effort undertaken in 2019 supports the survey evidence that no roosting features are present along the treeline within the redline boundary, with the exception of 1 tree. However, as all trees are to remain and fencing is to be implemented to protect the trees, it's unlikely that roosting bats will be impacted.

Foraging Bats

The PEA stipulates that no flood lights are to be implemented for this development. Additionally, the applicant ecologists' states that although the treeline and linear habitats offer foraging and commuting opportunities, they are unlikely to be of considerable importance due the presence of woodland and a trainline to the south. Whilst I agree with this statement, previous ecological surveys related to planning app: 190286 have revealed that seven species of bats were utilising the site for foraging and commuting purposes, whilst the southern parcel closest to the woodland did have the highest foraging and pass over, species were still present within this parcel of land for development. Therefore, if any lighting is to be implemented, it must include a bat sensitive lighting scheme which follows ILP and Bat Conservation Trust 08/2023 guidance note. I recommend securing any lighting to be conditioned with a sensitive lighting condition.

The development does require sports netting to screen the western boundary in front of mature trees. I agree with the applicant ecologists that the ball stop fencing will be required to be large mesh to prevent flying birds being impacted and prevent entanglement for foraging and commuting bats. As the fencing is to be in an area of low foraging value I agree with the assessment that bats are unlikely to be impacted.

I recommend securing netting details as part of the Biodiversity Method statement to ensure the development does not impact foraging and commuting bats to ensure compliance with Conservation of Habitats and Species Regulation 2017, Wildlife and Countryside Act 1981 and Wokingham Core Strategy CP7.

Birds

According to the Arb report a small reduction in hedgerows and a single tree removed will be required to facilitate this development.

Under the Wildlife and Countryside Act 1981, it is a criminal offence to remove, damage or destroy the nest of any wild bird and their eggs.

The PEA instructs for precautionary measures for any vegetation removal or limb removal; *"If the removal of any trees or shrubs is necessary this should be completed*

outside of the peak bird nesting season (March to August) or alternatively, following an inspection by an ecologist confirming that there is no current nesting activity. If nesting birds are discovered before or during any work, work should stop immediately and should only continue once bird nesting has finished, i.e. young have fledged and left the nest"

I agree with these precautionary measures to comply with Wildlife and Countryside Act 1981 and recommend securing this mitigation as part of the biodiversity method statement.

Great Crested Newts

Great crested newts are a European Protected Species under the Conservation of Habitats and Species Regulation 2017 making it illegal to impact their eggs, breeding sites and resting places.

The applicant site falls within an amber zone for great crested newts, with a total of four ponds within 500m and no dispersal barriers. The applicant ecologists does present precautionary mitigation measures, however as the sits falls within an amber zone and Natural England GCN Rapid Risk Assessment Tool indicates offence likely, NatureSpace should be consulted. That is all I have to say relating to great crested newts.

Reptiles

The site is regularly managed other neutral grassland according to the PEA and the BNG report. The PEA specifies that the site that reptiles could opportunistically cross the site if present in the neighbouring habitats.

Previous survey effort relating to app: 190286 indicate adult slow worms and adult grass snake recorded within the application site boundary.

The PEA recommends precautionary mitigation measures for pre-commencement and during construction, these include; removal of scrub and woody debris done with hand tools and hand search prior to removal, management of the grassland to prevent colonisation by reptiles, store material on pallets not onto the ground and backfill excavations or supply ramps to prevent trapping wildlife.

I agree these precautionary measures are required due the previous presence of slow worms and grass snakes, both of which are priority species under the 2010 Biodiversity framework. The precautionary measures ensure harm to individual priority species are reduced as such comply with Wokingham Core Strategy CP7. I recommend securing these measures as part of the biodiversity method statement.

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 following

“• *Creation of stag beetle loggeries.*

- *Creation of rockeries to provide cover for small species e.g. great crested newt;*
- *Wildlife-friendly, native landscaping; and*
- *Tree-mounted woodcrete bat and bird boxes”*

To ensure delivery of these biodiversity enhancements and compliance with Wokingham Borough Development Plan, TB23, it is recommended that a Species Compensation and Enhancement condition is attached to any grant of planning permission.

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.

Lighting design strategy for light-sensitive biodiversity – Condition

Prior to occupation, a “lighting design strategy for biodiversity” 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.

Biodiversity method statement condition

No development shall take place (including any demolition, ground works, site clearance) until a method statement for habitat protection, amphibians, breeding birds and mammals has been submitted to and approved in writing by the local planning authority. The content of the method statement shall include the:

- a) purpose and objectives for the proposed works;
- b) detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
- c) extent and location of proposed works shown on appropriate scale maps and plans;
- d) timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- e) persons responsible for implementing the works;
- f) initial aftercare and long-term maintenance (where relevant);
- g) disposal of any wastes arising from works.

The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 198 Section 15 Core Strategy policies CP7 and Managing Development Delivery Local Plan policy TB23.

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 boxes on retained trees, creation of rockeries for great crested newt and stag beetles loggeries, 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:	13/08/26	Signed:	L.Aparo
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