

# MEMORANDUM

|                             |                                                                                                                                          |                |        |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------|
| <b>From:</b>                | Duncan Fisher<br>Ecology Officer                                                                                                         |                |        |
| <b>Service</b>              | WBC Ecology                                                                                                                              | <b>App No:</b> | 251421 |
| <b>Address:</b>             | N/A, Land At Old Forest Road, Wokingham.                                                                                                 |                |        |
| <b>Proposal:</b>            | Full application for erection of 53 no. dwellings with associated landscaping, parking, drainage, open space and other associated works. |                |        |
| <b>Type of Development:</b> | Major Dwellings (10+)                                                                                                                    |                |        |
| <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

Further ecological information has been submitted in the form of a revised Ecological Impact Assessment (AA Environmental Ltd, ref: 253026 revision A, September 2025) and a supporting cover letter (AA Environmental Ltd, 15 September 2025). Further, a revised Tree Condition Survey, Arboricultural Implications Assessment and Tree Protection Recommendations (Goodger Design Associates, November 2025) and supporting plans have been submitted.

### Biodiversity Net Gain

#### Degradation

In my previous response, I noted that the Biodiversity Net Gain Technical Note and Ecological Impact Assessment (EclA) did not explicitly consider whether the site has been degraded prior to survey and whether a different condition or habitat type needed to be considered as the baseline. No revision of the Biodiversity Net Gain Technical Note has been submitted to consider this matter. The Revision A of the EclA has not explicitly considered the potential for degradation. The cover letter does not explicitly consider degradation. It does however repeat how the condition assessment for the grassland on-site was based on the survey visits. A link is provided to Google Earth which is supposed to provide corroborating historic satellite imagery. This link does not work. If the applicant's ecologist want this to be considered as evidence please can they provide a working link or annotated figures explaining the supporting evidence.

In the meantime, I shall provide some annotated screenshots to support my view that this site has met the sward height condition criterion in the period since January 2020 and that the mowing which has reduced the condition assessment value at the time of the EclA assessments should be considered degradation.

Our available aerial imagery from 2022 (flown and captured on 20 April 2022) shows worn areas from paths across the two fields:



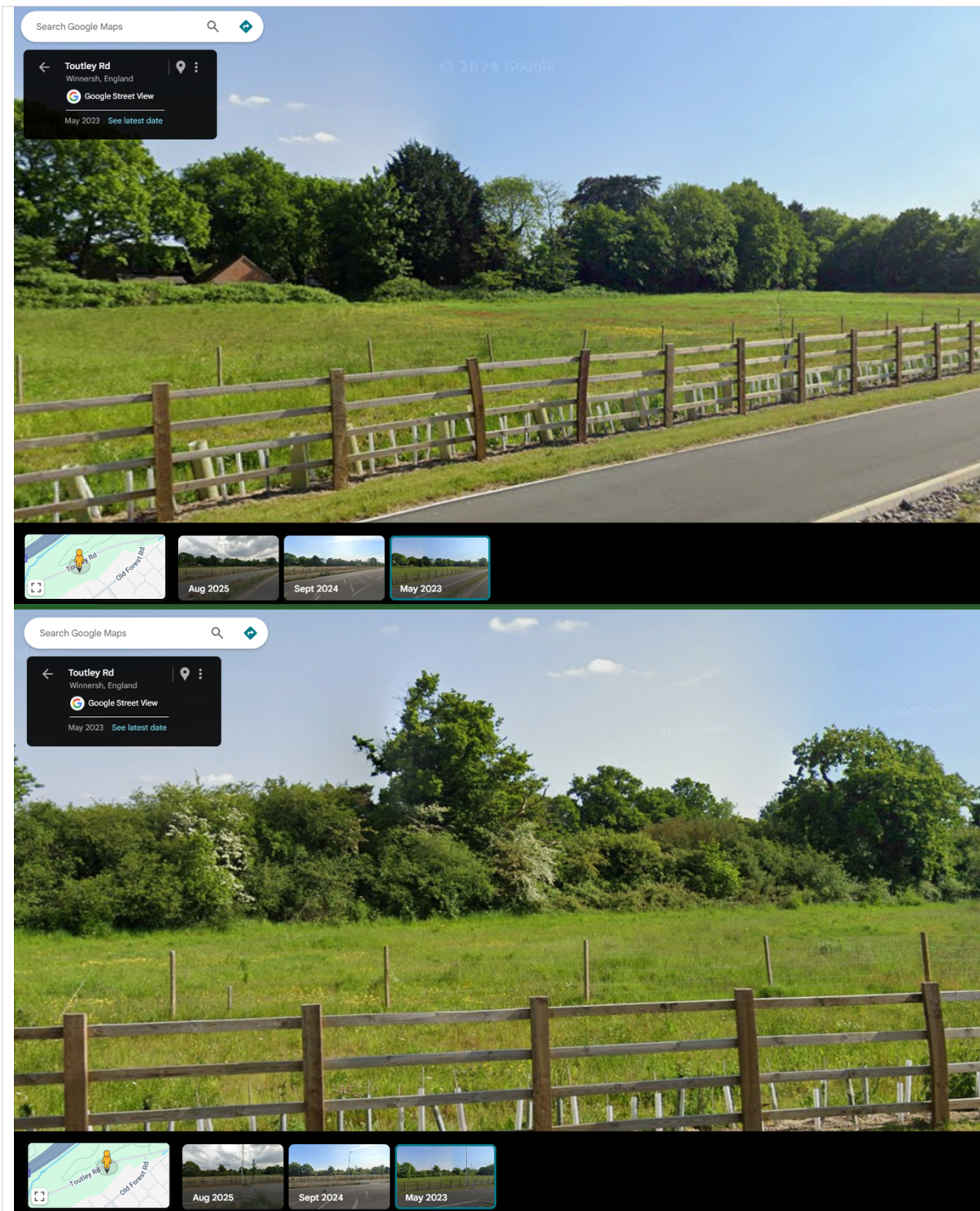
Aerial imagery from 2019 (flown and captured on 26 June 2019) which shows bare ground and worn paths prior to the BNG rollback date, indicating some of the paths have been in existence for a substantial period and structural variation present at a different time of year:



Google Street View showing structural variation and long grass in September 2024:



Google Street View showing structural variation and different grass types in May 2023:



I therefore think it reasonable to conclude that the baseline condition of the grass fields is recorded as good.

### Veteran Trees

Paragraph 4.23 of the EclA has been amended with the conclusion that trees T9 and T15 are notable trees. The cover letter goes further and states that the trees are not veteran. There is no additional information to explain how the notable/veteran status was assessed by the applicant's ecologist. It is hard to understand how this conclusion was reached with the very limited explanation. How

has the applicant's ecologist considered the pathway to veteran status through the tree supporting rare species? At the moment there seems to be a reliance on the category given by the Woodland Trust in the Ancient Tree Inventory rather than this being a starting point that might need further investigation or assessment, particularly in light of the time since they were surveyed for the inventory (March 2010) and now. Please can the applicant's ecologist provide a supporting explanation as to how they made their assessment.

#### Scrub Habitat

The cover letter claims that the Gorse scrub is off-site. Below is an image snip showing that, in 2022, there was an area of scrub within the Ordnance Survey Master Map boundary line (the cyan highlighted line) that has been traced/used for the red line boundary. This area of scrub is greater than the minimum mappable unit for UK Habs classification. I recommend that the baseline is updated to reflect the presence of the scrub habitat.



Regarding the hedgerow width whether scrub needs to be recorded along the southern boundary. I am not convinced by the argument made in the cover letter that these are restricted areas of suckering hedgerow – although suckering hedgerow that is going beyond the 5m maximum width to classify a hedgerow should be considered as scrub. The submitted Tree Survey clearly shows the extent of the shrub/scrub vegetation along the southern border. As it is on the boundary, some of the habitat extends outside the red line. However, it needs to be considered as a unit to understand how it is to be recorded. The hedgerow is a 5m strip along the centre line of this unit. Beyond that should be recorded as scrub habitat. Clearly the Tree Survey has picked up and measured this feature as being greater than 5m wide and extending into the site further than 2.5m from the centreline.

#### Native Hedgerow with Trees – Associated with Bank or Ditch

The cover letter makes the claim that two parallel hedgerow run immediately adjacent to each other, each side of the ditch. No further supporting evidence (e.g. photographs) are supplied to support this interpretation. This claim does not appear to be supported by the Tree Survey which puts trees T1 to T4 right on the site boundary and in the centre of the hedgerow. T5 is functionally linked to the hedgerow (although I admit that this could be on the outer limits of the width of the hedgerow and growing more in the expanding scrub). I am not convinced at all by the argument that these trees are not part of the mapped hedgerow and I recommend that the baseline BNG assessment is adjusted accordingly.

#### Ditch

Although not supported by any photographic evidence, I accept that the ditches recorded on site could be separated by a land bridge and that this is an appropriate way to record in the baseline.

#### **Bats**

The presence or otherwise of protected species is a material consideration relevant to determination as it may have an impact on design.

The EclA still does not include an assessment of the use of the site by foraging and commuting bats. The cover letter remains mute on this point, too. This is contrary to survey guidance for bats. Please can the applicant provide an ecological justification for not surveying to assess the significance of the site for foraging and commuting of a European Protected Species that has the potential to be present on site.

#### Trees T12, T13, and T14

The EclA has been updated to provide a new paragraph (5.28) advising how trees with bat roost potential should be felled following a precautionary approach. This misses the point of the concern raised in my first response. The cover letter equally misses the point.

The applicant's ecologist has identified the potential for bat roosts to be present but has not investigated further despite their recommendation that further survey work is required to determine presence or likely absence. Despite the doubt that this leaves unresolved – that there may be destruction of a bat roost through the removal of these trees – the applicant's ecologist has failed to give advice as to what is likely to be required to obtain a derogation licence from Natural England, should follow up inspections of the potential roost features confirm presence of a bat roost. It is not clear what compensation may be required and the local planning authority does not have the supporting information to be able to conclude that a licence is not unlikely to be granted by Natural England.

The most straightforward way to resolve this is for further information to be supplied to show where compensation roost features (e.g. bat boxes), commensurate with the loss of these trees, will be provided in the post-development scenario. I recommend that the local planning authority seek this in the form of a short technical note and plan. The implementation of this can then be secured by condition and the local planning authority can be confident that the proposals are not contrary to local plan policy CP7.

| Conditions & Reasons (if required) |                        |                |           |
|------------------------------------|------------------------|----------------|-----------|
| Refer to first ecology response    |                        |                |           |
| <b>Date:</b>                       | 14<br>November<br>2025 | <b>Signed:</b> | D. Fisher |