

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	251774
Address:	1B Old Sawmill Lane, Crowthorne, Wokingham, RG45 6LN.		
Proposal:	Outline application for the proposed erection of 2no. self-build dwellings with associated parking and access. (All matters reserved except for access, layout and scale).		
Type of Development:	Minor Dwellings (1-9)		
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

The documents reviewed for this proposed application are as follows:

- Proposed Site Plan, Revision 8, 03/09/25
- Outline Planning Application Form, PP-14201750
- Preliminary Ecological Appraisal and Roost Assessment, Issue 1.0, 16/07/25

Biodiversity Net Gain (BNG)

I agree with the applicant's assessment of baseline habitats. This proposed development is exempt for the Statutory BNG, as it qualifies as a 'self-build, meeting all criteria; consist of no more than 9 dwellings, on a site no larger than 0.5ha and consist exclusively of self-build dwellings.

As this is proposed development is exempts from Statutory Biodiversity Net Gain, it does not have to provide a 10% net gain of habitat and hedgerow units on site.

Thames Basin Heath, Special Protection Area (SPA).

This development is located within the 5 km linear mitigation zone for the Thames Basin Heath Special Protection Area (SPA), a nationally designated site. In accordance with Policy CP8 – Thames Basin Heath of the Wokingham Core Strategy, the proposed increase of two additional dwellings must be appropriately assessed and provide a financial contribution toward the maintenance and protection of the SPA.

Paragraph 4.49 of Policy CP8 states:

*“The Appropriate Assessment indicates that to ensure development avoids likely significant impacts upon the SPA, the following principles will apply:
i) Dwellinghouses and other residential development (including staff accommodation in Use Class C2) must provide avoidance and mitigation measures where:*

a. The proposal involves one or more net additional residential units within 5 km (linear) of the SPA. Contributions toward on-site SPA access management measures and monitoring, in line with the Delivery Framework, will be required, along with the provision of SANG at a minimum of 8 ha per 1,000 population (calculated at a rate of 2.4 persons per household). This monitoring includes assessing the effectiveness of the SANG.”

As this proposal involves additional residential development within the 5 km mitigation zone, the applicant will be required to provide a financial contribution toward the maintenance of existing Suitable Alternative Natural Greenspace (SANG), to be managed in perpetuity as an alternative recreational area to the SPA. In addition, a contribution toward Strategic Access Management and Monitoring (SAMM) will also be required.

These SAMM contributions will be secured through a Section 106 Agreement.

SSSI Impact Risk Zones

The application site does fall within two SSSI Impact risk zones, however as the residential units is under the amount required for consultation, Natural England does not need to be consulted.

Bats

I agree with the application ecologist's assessment that the site itself has negligible potential for roosting bats. However, the mature oak trees along the western boundary and the adjacent woodland habitat provide suitable conditions for bats, functioning as an important wildlife corridor connecting surrounding areas of priority woodland habitat.

Given that the adjacent woodland and mature oaks offer foraging, commuting, and potential roosting opportunities, a Lighting Plan will be required to ensure that these habitats are not adversely affected by artificial lighting associated with the proposal. Bats are European Protected Species, protected under the Conservation of Habitats and Species Regulations 2017. It is an offence to kill, injure, or disturb bats, or to damage or destroy their breeding or resting sites. In line with national guidance and Policy CP7 – Biodiversity of the Wokingham Core Strategy, developments that may impact species of principal importance—such as bats—must include appropriate mitigation measures. In this instance, for appropriate mitigation, a detailed lighting plan will be required.

The applicant should submit a Lighting Plan detailing the location, type, and specification of all proposed lighting. This plan should follow the *Bat Conservation Trust Guidance Note 08: Bats and Artificial Lighting*. It is recommended that a

Lighting Design Strategy for Light-Sensitive Biodiversity condition be required to secure details of the lighting plan.

Although the ecologist confirms that the site offers negligible foraging potential, the roosting potential of the two mature oak trees on the western boundary has not been fully assessed. Records indicate up to five bat species within 2 km of the site, including two species of principal importance. In the absence of specific information on roosting potential (i.e. high, medium, or low), a precautionary approach should be adopted. If any works—such as crown reduction—are proposed to these trees, an ecologist should be present to inspect and survey the trees prior to works commencing.

It is therefore recommended that this precautionary approach be secured through a Construction Environmental Management Plan (CEMP) condition. The CEMP should set out measures for construction lighting control, and detail how potential impacts to bats will be avoided or mitigated during the construction phase.

The application ecologist has also made appropriate biodiversity enhancement recommendations for bats, particularly pipistrelles, which have been recorded in the area. The installation of integrated bat boxes should be secured through a Species Compensation and Enhancement Condition, referencing the specific products and locations recommended in the Preliminary Ecological Assessment.

Birds

I agree that the proposed development site does not offer any suitable nesting habitats for birds. However, similar to bats, the surrounding habitat, the mature oaks on the western boundary included, provides suitable foraging and nesting potential for birds. Birds and their nests are protected Wildlife and Countryside Act 1981. It is an offence to damage, destroy nests in use or being built. To ensure this development is in keeping with this legislation, any works to the mature oak trees on the west, are to be completed outside of nesting bird season (February – October inclusive).

Additionally, the ecologist recommends the installation of bird boxes within the proposed development to increase potential nesting habitat. The enhancements proposed will meet Wokingham Management Development Delivery Policy TB23, paragraph a) ensuring all new development incorporate new biodiversity features. The biodiversity enhancements are recommended to be secured as a part of the wider Species Compensation and Biodiversity Enhancement condition.

Hedgehog

Hedgehogs are a species of principal importance both nationally and to Wokingham. The application ecologist states that the proposed development does not pose any habitats that are suitable for hedgehogs, of which I agree. The Ecological Impact Assessment does propose the use of hedgehog highways to allow hedgehogs the ability to move freely across the site. The incorporation of hedgehog highways would meet policy compliance, of Policy TB23 Biodiversity and Development, paragraph c) *“Ensure that all existing and new developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors”*. Hedgehog highways would ensure the permeability of the new development.

I recommend securing the biodiversity enhancement of hedgehog highways as apart of the Species compensation and enhancement condition.

Conditions & Reasons (if required)

Lighting design strategy for light-sensitive biodiversity – Condition

Prior to occupation, a “lighting design strategy for biodiversity” for bats, birds and hedgehogs should specify buildings, 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.

Construction Environmental Management Plans (CEMP):

Condition: No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of “biodiversity protection zones”.
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs. The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority

Reason: To ensure mitigation measures for protected and priority species are appropriate and secured by local plan policy CP7 and 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) per dwelling and access points for hedgehog to gardens, 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:	30/10/25	Signed:	Louise Aparo
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