

**Town and County Planning Act 1990
Section 78 (As Amended)**

STATEMENT OF COMMON GROUND ON ECOLOGY AND BNG MATTERS

Prepared by:

**Woolf Bond Planning LLP
for Dandara Southern Ltd & Elstree Land Ltd**

and

Wokingham Borough Council



**WOKINGHAM
BOROUGH COUNCIL**



Woolf Bond Planning
Chartered Town Planning Consultants

Land North of Reading Road, Arborfield

PINS Ref: APP/X0360/W/25/3371069

LPA Ref: 243099

WBP Ref: 9015

January 2026

CONTENTS

1. MATTERS NOT IN DISPUTE.....	3
Biodiversity Net Gain ("BNG").....	3
Protected Species.....	4
2. MATTERS IN DISPUTE	4
Protected Species.....	5
3. ADDITIONAL INFORMATION.....	5
4. AGREEMENT: SCHEDULE OF COMMON GROUND	6

1. **MATTERS NOT IN DISPUTE**

1.1 The following matters are not in dispute:

Biodiversity Net Gain ("BNG")

1.2 The application was submitted post commencement of mandatory BNG and there are no valid exemptions from this requirement.

1.3 The Appellant submitted an updated BNG Metric Iteration V2 completed on 26th January 2026 ("2026 BNG Metric"), which supersedes all previous iterations of a BNG Metric.

1.4 The 2026 BNG Metric adequately reflects the baseline for BNG purposes.

1.5 The 2026 BNG Metric supplies a post-development scenario, but this is not to be approved in detail at this stage. It can, however, be used as an indicative strategy for BNG plan should permission be granted.

1.6 The indicative strategy for BNG delivery is to use both on on-site and off-site habitat creation or enhancement to achieve the target of 10% BNG. This strategy is possible under the BNG regulations.

1.7 There is no current mechanism to secure greater than 10% mandatory BNG requirement.

Protected Species

- 1.8 Both records returned in desktop survey and detector surveys on the Site indicate presence of bat species, including light sensitive species such as *Myotis* sp., *Plecotus* sp. and *Barbastelle*.
- 1.9 The Appellant's Highways Proof of Evidence indicates that 22 new lighting columns are proposed as off-site highway works, i.e. outside of the red line boundary of the Site. This part of the proposal was not included as part of the original planning application, nor was it assessed in the original application's Ecological Impact Assessment.
- 1.10 The Ecology Statement submitted with the Appellant's Planning Proof of Evidence provides an assessment of the impacts of the proposed lighting on Reading Road, but does not include any of the supporting evidence relied on for this assessment.

Commented [BT1]: Addressed below in Matters in Dispute.

Commented [JC2R1]: Brigid, this is factual - otherwise the matter not in agreement would be "whether or not the Ecology Statement included any of the supporting evidence relied on for this assessment".

2. **MATTERS IN DISPUTE**

- 2.1 The parties disagree on the following matters:

Protected Species

- 2.2 Whether or not the proposed lighting extending off-site would adversely impact light-sensitive protected species.

Commented [JC3]: We have rejected the changes as they referred to mitigation hierarchy. The issue at hand is whether the proposal would or would not adversely impact species in first instance.

3. **ADDITIONAL INFORMATION**

Commented [BT4R3]: Accepted.

- 3.1 The Appellant intends to produce further evidence on the ecological impacts of the off-site pedestrian improvements .

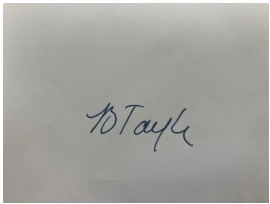
4. **AGREEMENT: SCHEDULE OF COMMON GROUND**

4.1 This document is accepted as the agreed Statement of Common Ground for the Appeal being considered under PINS Ref:

APP/X0360/W/25/3371069

4.2 It has been duly signed by representatives of the Appellant and Wokingham Borough Council.

Signed on behalf of the Appellant

Name:	Brigid Taylor on behalf of Dandara Southern Ltd & Elstree Land Ltd
Signature:	
Date:	30.01.2026
Position:	Associate Director

Signed on behalf of Wokingham Borough Council

Name:	Joanna Carter on behalf of Wokingham Borough Council
Signature:	
Date:	30 th January 2026
Position:	Principal Planning Officer
