

**Land off Range Road
Finchampstead
Berkshire
RG40 3NP**

Preliminary Ecological Appraisal (incl. Biodiversity Net Gain Assessment)

Report ref.: R3078_PEA & BNG_b

Report Quality Control Information	
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1 EXECUTIVE SUMMARY

- 1.1.1** John Wenman Ecological Consultancy LLP was instructed by ET Planning on behalf of their clients to undertake a Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain (BNG) Assessment of land off Range Road in Finchampstead, Berkshire. The PEA and BNG surveys were commissioned to accompany a full planning application to be submitted to Wokingham Borough Council seeking consent for the construction of a caravan pitch with associated buildings and access to Range Road (see proposed site layout in **Appendix 2**).
- 1.1.2** The desk study (including a TVERC data search) revealed that the application site is not statutorily or non-statutorily designated for its wildlife interest and has no protected/notable species records. John Wenman MCIEEM carried out a site visit on the 12th November 2025.
- 1.1.3** The application site covers 0.15ha of land off Range Road. It is characterised by a felled section of mixed woodland (mapped as priority habitat) with surrounding off-site mixed woodland. The felled section is considered a habitat of high distinctiveness.
- 1.1.4** The following recommendations have been made: habitat protection measures; a sensitive lighting strategy for commuting/foraging bats; precautions for amphibians, reptiles, small mammals and nesting birds; and biodiversity enhancement measures including the provision of bat and bird boxes.
- 1.1.5** The Biodiversity Metric calculation tool demonstrates that the feasibility of delivering a minimum of 10% onsite net gain for biodiversity is not possible within the scope of the proposals. The results taken from the tool show a total onsite net change of -83.81% and a loss of 3.06 habitat units. This translates to a deficit of 3.42 habitat units for achieving a 10% net gain for the site. To meet the mandatory requirement of a minimum of 10% net gain for biodiversity, offsite gains will need to be made by either purchasing units from a land manager or utilising land outside of the application site but under the applicant's ownership, which can be registered and secured for 30 years.
- 1.1.6** This report will likely be valid for up to 18 months; after which point a professional ecologist may need to review the report's validity (CIEEM 2019b).

2 INTRODUCTION

2.1 Project Background

2.1.1 John Wenman Ecological Consultancy LLP was instructed by ET Planning on behalf of their clients to undertake a Preliminary Ecological Appraisal (PEA) and Biodiversity Net Gain (BNG) at land off Range Road in Finchampstead, Berkshire.

2.1.2 The PEA and BNG surveys were commissioned to accompany a full planning application to be submitted to Wokingham Borough Council seeking consent for the construction of a caravan pitch with associated buildings and access to Range Road (see proposed site layout in **Appendix 2**).

2.2 Site Location and Context

2.2.1 The application site covers 0.15ha of land to the east of Range Road in Finchampstead, Berkshire (Central OS grid ref.: SU 80824 65144).

2.2.2 The site is situated within habitat partly mapped as deciduous woodland priority woodland (NERC Act 2006 Section 41 habitats of principle importance) between Wokingham to the north and Finchampstead to the south. Properties and their associated gardens are situated along Range Road with suburban housing along Nine Mile Ride approximately 50 metres to the south.

2.3 Report Objectives

2.3.1 The aim of this PEA is to understand the nature of the site and assess its ecological value. The key objectives are to:

- identify any likely ecological constraints associated with the planning proposals;
- establish appropriate mitigation measures in accordance with the mitigation hierarchy (i.e. avoid > mitigate > compensate);
- determine any additional surveys that may be required following on from this preliminary stage; and
- recognise opportunities to deliver ecological enhancements in line with national and local planning policy.

3 LEGISLATIVE BACKGROUND

3.1 Relevant Legislation

3.1.1 The following legislation is considered relevant for the purpose of this Preliminary Ecological Appraisal (PEA):

- Wildlife and Countryside Act (W&CA) 1981 (as amended)
- Conservation of Habitats and Species Regulations ('Habitat') Regulations 2017
- Countryside and Rights of Way (CROW) Act 2000
- Natural Environment and Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992
- Wild Mammals (Protection) Act 1996

3.1.2 These acts hold relevance to both protected and invasive species and the degree of protection varies depending on faunal/floral group or species. For example, some species of European importance receive full protection in England and Wales under the Habitat Regulations (e.g. bats), whereas others may only be afforded protection through national legislation such as the W&CA 1981 (as amended) (e.g. common lizard). For a detailed overview of species-specific legislation, please refer to **Appendix 1**.

3.2 European Protected Species Mitigation Licensing

3.2.1 The Government's statutory nature conservation advisory organisation, Natural England, is responsible for issuing European Protected Species (EPS) mitigation licences that permit activities that would otherwise lead to an infringement of the Habitat Regulations. An EPS mitigation licence can be issued if the following three tests derived from Regulation 55 have been satisfied:

- (2)(e) – the derogation is for the purposes of '*preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.*'
- (9)(a) – there is '*no satisfactory alternative*' to the derogation; and
- (9)(b) – '*the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.*'

3.2.2 Local Planning Authorities (LPAs) have a statutory duty under Regulation 7(3)(e) of the Habitat Regulations consider and determine whether these three tests are likely to be satisfied by planning proposals affected EPS before granted planning permission. If an

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EPS mitigation licence is necessary, a licence can be sought once all the necessary planning consents have been granted. Natural England aims to issue a decision on licence applications within 30 working days of submission.

4 PLANNING POLICY

4.1 National Planning Policy

4.1.1 The biodiversity duty imposed through the Environment Act 2021 states that Local Planning Authorities (LPAs) must consider what action they can take to conserve and enhance biodiversity in England.

4.1.2 The ODPM Circular 06/2005 provides guidance on the application of the law relating to planning and nature conservation in England, stating that *'the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.'*

4.1.3 revised National Planning Policy Framework (NPPF), published in December 2024, sets out the Government's planning policies for England and how they should be applied. Section 15 of the NPPF sets out the approach local authorities should adopt to conserve and enhancing the natural environment when preparing planning policy and when considering planning applications. Paragraph 193 sets out the principles LPAs should apply when determining planning applications, as follows:

'When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is

appropriate.'

- 4.1.4** In England, BNG became mandatory for major development from the 12th February 2024 and for minor development (small sites) from the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). In practice, planning permission in England is now subject to a condition to secure a minimum 10% net gain for biodiversity, unless the development is a type that is exempt from mandatory BNG requirements.

4.2 Local Planning Policy

- 4.2.1** Wokingham Borough Council currently has in place a Core Strategy Development Plan Document (DPD), adopted in January 2010. The Core Strategy DPD sets out the long term 'spatial vision' for the Wokingham Borough up until March 2026. Work is underway on the new Local Plan Update document which will refine the current Core Strategy and Managing Development Delivery local plans for the borough up to 2040.

- 4.2.2** When considering planning applications, it is the local authority's obligation to consider the impacts of the development on protected species as set out in the NPPF and the OPDM Circular 06/2005.

- 4.2.3** The Strategic Flood Risk Assessment (SFRA) is a strategic document which identifies zones of risk to help in the allocation of land for development, for Development Management decision making purposes. Policy CP7 of the Core Strategy DPD provides guidance on how biodiversity should be considered as part of development. The Policy states: *'Sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance. Development:*

Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly, or

Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly, or

That compromises the implementation of the national, regional, county and local biodiversity action plans will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and:

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Mitigation measures can be put in place to prevent damaging impacts;

or Appropriate compensation measures to offset the scale and kind of losses are provided.'

- 4.2.4** Policy CP8 of Wokingham Borough Council's Core Strategy DPD provides guidance on the avoidance and mitigation measures required for any net gain in residential development within 7km of the Thames Basin Heath SPA. The Policy states:
'Development which alone or in combination is likely to have a significant effects on the Thames Basin Heaths Special Protection Area will be required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered.'

The Appropriate Assessment indicates that to ensure that development avoids its likely significant impact upon the SPA, the following principles will apply:

- i) Dwelling houses and other residential development (including staff accommodation in use class C2) will need to provide avoidance and mitigation measures where:*
 - a. The proposal involves the provision of one or more net additional residential unit and is within 5km (linear) of the SPA. Contributions to on site SPA access management measures and monitoring in line with the Delivery Framework will be required together with provision of SANG at a minimum of 8ha/1,000 population (calculated at a rate of 2.4 persons per household). This monitoring includes the effectiveness of the SANG;*
 - b. The proposal provides 50 or more residential units within 7km (linear). In this case, the proposal will be individually assessed for whether a significant effect upon the SPA is likely either on its own or in combination with other plans or projects around the site. Where avoidance and mitigation measures are required to address likely significant effects, this is likely to involve SANG together with funding towards monitoring the effectiveness of the solution agreed;*
 - c. There is a 400m exclusion zone from the SPA for any net additional dwellings due to the inability to avoid likely significant effects upon the SPA.*
- ii) SANG to be provided and maintained in perpetuity in line with the quality and quantity standards advocated by Natural England. The size and location of SANG contributes towards the delivery of healthy communities in line with advice from the Department of Health and NICE. In order to ensure access to avoidance sites in perpetuity, the Council's preference is for the authority to own any SANG. Where SANG also meets the definition of open space (see Appendix 4), it can also count towards this provision i.e. at least 1 ha/1,000 of the SANG could also contribute*

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towards the Natural Greenspace requirement and vice versa; and

iii) Non-residential development will be individually assessed for their likely significant effects. Where avoidance and mitigation measures are required, monitoring of their effectiveness will be necessary.'

5 SURVEY METHODOLOGY

5.1 Zone of Influence

5.1.1 Ecological assessment guidance (CIEEM 2018) recommends that all ecological features that occur within a 'Zone of Influence' (ZoI) for a proposed development are investigated. The ZoI includes:

- Areas directly within the land take for the proposed development and access;
- Areas which will be temporarily affected during construction;
- Areas likely to be impacted by hydrological disruption; and
- Areas where there is a risk of wider disbenefits including, but not limited to, any increase in air, water, or noise pollution; or visual or vibrational disturbance during construction and/or operation.

5.1.2 The ZoI is variable depending on the nature of the construction activities and the ecological receptors affected. For this assessment the following zones have been defined as described in Table 1.

Table 1 – Zone of influence

Ecological features	Zone of influence	Notes
Designated sites of international importance - see notes	5km	Special Area of Conservation (SAC), Special Protection Area (SPA) & Ramsar site
Designated sites of national importance – see notes	2km	Sites of Special Scientific Interest (SSSI)
Sites of local importance – see notes	1km	Local Wildlife Site (LWS), Local Nature Reserve (LNR) & Biodiversity Opportunity Area (BOA)
Protected and notable species – see notes	1km	Refer to Table 3
Habitats of principal importance for conservation (HPI)	1km	As defined under Section 41 of the NERC Act 2006
Application site (species and habitats)	Site and land within 30m (as access constraints allow)	

5.2 Desk Study

5.2.1 A desktop study was conducted by Jake Morgan (Qualifying member of CIEEM). The study utilised data from the local environmental records centre and open access online resources to acquire information on the nature of the site and its surroundings and highlight any potential ecological features.

5.2.2 Thames Valley Environmental Record Centre (TVERC) - the local environmental records centre - was commissioned to undertake a search of pre-existing records of protected and/or notable species and non-statutorily designated wildlife sites held by them within a 1km radius around a central point inside the site.

5.2.3 The DEFRA Data Services Platform was used to obtain geospatial datasets for

designated sites (i.e. RAMSAR, SPA, SAC, SSSI) and important habitats (i.e. Priority Habitat Inventory, Ancient Woodland Inventory) to be analysed in QGIS within the Zone of Influence. The Multi-Agency Geographical Information Centre (MAGIC) website was examined for granted European Protected Species (EPS) licence applications. These geospatial datasets and Google Earth satellite imagery were used to determine the extent and connectivity of habitats, how the site is linked to the surrounding landscape and whether the development could have wider scale impacts on biodiversity.

5.2.4 Historical OS maps and Google Earth satellite imagery were consulted to provide insight into historical and current land use; such information helps contextualise the continuity of habitats and determine the importance of existing ecological features on site.

5.2.5 The type of soil on site was inferred using geological information taken from the British Geological Survey and on-site interpretation.

5.3 Field Survey

UK Habitat Classification Survey

5.3.1 A site walkover was undertaken on the 12th November 2025 by John Wenman MCIEEM. The site was surveyed using the UK Habitat Classification (UKHab) system (UKHab Ltd 2023) in accordance with the Guidelines for Preliminary Ecological Appraisal (2nd Edition) (CIEEM 2017). Attention was given to evidence of protected and priority species (NERC Act 2006 Section 41 species of principal importance) and the site's potential to support such species.

5.3.2 There were no significant survey constraints because full access was available to the site; however, part of the site had been cleared and therefore an assessment of the site's habitats before clearance made use of aerial photography.

5.3.3 The survey was subject to seasonal constraints because not all plant and animal species are visible throughout the year and therefore the report represents a snapshot of the site at the time of the survey only.

5.3.4 This report will likely be valid for up to 18 months; after which point a professional ecologist may need to undertake a site visit and update the desk study and then review the report's validity (CIEEM 2019b).

5.4 Biodiversity Net Gain Approach

5.4.1 This Biodiversity Net Gain (BNG) Assessment uses the Statutory Biodiversity Metric (February 2024) to calculate the losses and gains in biodiversity unit value resulting from the proposals. The biodiversity metric tool has been used to guide the proposed site layout and landscaping in order to deliver a minimum 10% net gain for biodiversity.

5.4.2 The biodiversity metric rules must be followed for a valid biodiversity net gain and are as follows:

Rule 1: *The trading rules of this biodiversity metric must be followed.*

Rule 2: *Biodiversity unit outputs, for each type of unit, must not be summed, traded, or converted between types. The requirement to deliver at least a 10% net gain applies to each type of unit.*

Rule 3: *To accurately apply the biodiversity metric formula, you must use the statutory biodiversity metric calculation tool or small sites biodiversity metric tool (SSM) for small sites.*

The tools remove the need for a user to manually calculate the change in biodiversity value.

The tool will summarise the results of the calculation and inform a user whether the biodiversity net gain objective has been met.

Rule 4: *In exceptional ecological circumstances, deviation from this biodiversity metric methodology may be permitted by the relevant planning authority.*

5.4.3 The biodiversity metric principles inform the use of the biodiversity metric tool and are as follows:

Principle 1: *The metric assessment should be completed by a competent person.*

Principle 2: *The use of this biodiversity metric does not override existing biodiversity protections, statutory obligations, policy requirements, ecological mitigation hierarchy or any other requirements. This includes consenting or licensing processes, for example woodlands.*

Principle 3: *This biodiversity metric should be used in accordance with established good practice guidance and professional codes.*

Principle 4: *This biodiversity metric is not a complex or comprehensive ecological model and is not a substitute for expert ecological advice.*

Principle 5: *Biodiversity units are a proxy for biodiversity and should be treated as relative values.*

Principle 6: *This biodiversity metric is designed to inform decisions in conjunction with locally relevant evidence, expert input, or guidance.*

Principle 7: *Habitat interventions need to be realistic and deliverable within a relevant project timeframe.*

Principle 8: *Created and enhanced habitats should be, where practical and reasonable, local to any impact and deliver strategically important outcomes for nature conservation.*

Principle 9: *This biodiversity metric does not enforce a minimum habitat size ratio for compensation of losses. Proposals should aim to:*

- *maintain habitat extent - supporting more, bigger, better and more joined up ecological networks*
- *ensure that proposed or retained habitat parcels are of sufficient size for ecological function'*

6 DESK STUDY FINDINGS

6.1 Designated Sites and Habitats

- 6.1.1 The desk study returned one statutorily designated site of international importance within a 5km radius (SPA) and one statutorily designated site of national importance within a 2km radius (SSSI). Three locally designated non-statutory site, i.e. Local Wildlife Site (LWS), were highlighted within a 1km search radius – see **Tables 2a and 2b** below.

Table 2a. Statutorily designated sites within the vicinity of the site (Source: DEFRA).

Site name	Designation	Description	Distance from nearest site boundary (m)
Thames Basin Heaths	Special Protection Area (SPA)	The Thames Basin Heaths SPA covers an area of 8,275 ha across Hampshire, Berkshire and Surrey. It is part of a complex of heathlands in Southern England that support important populations of breeding birds, including the Dartford Warbler, Nightjar and Woodlark.	3750 E
Heathlake	Site of Special Scientific Information (SSSI) (also Local Nature Reserve (LNR))	An area of 6.1 ha comprising a small, shallow lake, surrounded by birch and pine woodland with areas of relict heathland. Heath Lake is a long-established open water habitat supporting specialist communities of native plants and animals. Of particular interest are populations of some uncommon and rare aquatic plant species.	1800 E

Table 2b. non-statutorily designated sites within the vicinity of the site (Source: TVERC).

Site name	Designation	Description	Distance from nearest site boundary (m)
Land to the east and west of Sandhurst Road	Local Wildlife Site (LWS)	A 39.35ha area of mixed woodland, wetland, heathland and grassland as well as Queen's Mere Lake. The wet woodland is dominated by alder, birch and willow with sections being degraded mire habitat invaded by birch, willow and alder. Drier areas of woodland contain pine and birch and more semi-natural stands of oak and birch woodland. Heathland, acidic grassland and a degraded valley mire are distributed throughout, allowing for a range of notable plants. Grass snake and southern wood ant have been found within the woodland.	250 NE
Gorrick Plantation	Local Wildlife Site (LWS)	An area of 77.88 ha comprising mainly woodland habitats with a little dry heath and acid grassland in a few places. The ride edges also have species indicative of heath and acid grassland. Scots Pine plantations dominate this working plantation. There are also other conifers including Western Hemlock-spruce and Corsican Pine. Ground flora can include Rhododendron, Bracken and Purple Moor-grass. Deciduous woodland is more prevalent at the edges of the site. In the 2023 survey, there were 20 indicator species of woodland, 12 typical species of lowland fen plus 16 typical species of acid grassland. There are relatively recent records of reptiles: Adder, Common Lizard and Slowworm.	870 NE
Simons Wood and Heath Pond	Local Wildlife Site (LWS)	A 17.8ha national trust nature reserve comprising Scots pine plantation, secondary woodland, heath, purple moor-grass and a large pond. The site has restored heathland with a small bog pool and fringe of mire/wet heath. Two heathland areas range from purple-moor-grass dominated to a mosaic of	910 S

		heather, bare ground and wetland plants. The site is surrounded by pine and birch regenerative woodland and the large pond is a denotified SSSI.	
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6.1.2 The application site is set within an area mapped as mixed priority woodland (NERC Act 2006 Section 41 habitats of principle importance).

6.2 Protected and Notable Species

6.2.1 The search of the TVERC database revealed a range of protected and notable species records. Only recent records defined as fewer than ten years old are included in this report (see **Tables 3a & 3b**).

Table 3a. Species within a 1km radius of the site (Source: TVERC).

Common name	Scientific name	No. of records	Most recent record	Status
Amphibians & Reptiles				
Slow-worm	<i>Anguis fragilis</i>	4	2020	WACA-Sch5-s9.1k/s9.5a, NERC-S41
Grass snake	<i>Natrix helvetica</i>	1	2018	WACA-Sch5-s9.1k/s9.5a, NERC-S41
Adder	<i>Vipera berus</i>	2	2020	WACA-Sch5-s9.1k/s9.5a, NERC-S41
Common lizard	<i>Zootoca vivipara</i>	1	2021	WACA-Sch5-s9.1k/s9.5a, NERC-S41
Birds				
Brambling	<i>Fringilla montifringilla</i>	1	2022	WACA-Sch1-p1
Kingfisher	<i>Alcedo atthis</i>	1	2021	WACA-Sch1-p1
Linnet	<i>Linaria cannabina</i>	1	2021	NERC_s41
Crossbill	<i>Loxia curvirostra</i>	1	2021	WACA-Sch1-p1
Red kite	<i>Milvus milvus</i>	1	2023	WACA-Sch1-p1
Yellow wagtail	<i>Motacilla flava</i>	1	2023	NERC_s41
House sparrow	<i>Passer domesticus</i>	8	2023	NERC_s41 BOCC_red
Dunnock	<i>Prunella modularis</i>	2	2023	NERC_s41
Bullfinch	<i>Pyrrhula pyrrhula</i>	1	2021	NERC_s41
Firecrest	<i>Regulus ignicapilla</i>	1	2022	WACA-Sch1-p1
Woodcock	<i>Scolopax rusticola</i>	1	2016	BOCC_red
Starling	<i>Sturnus vulgaris</i>	1	2020	NERC_s41 BOCC_red
Lapwing	<i>Vanellus vanellus</i>	1	2022	NERC_s41 BOCC_red
Invertebrates				
Stag beetle	<i>Lucanus cervus</i>	34	2023	WACA-Sch5-s9.5a, NERC_s41
Mammals (bats)				
Barbastelle	<i>Barbastella barbastellus</i>	2	2023	WACA-Sch5-s9.4b/ s9.4c, NERC_s41
Serotine	<i>Eptesicus serotinus</i>	2	2023	WACA-Sch5-s9.4b/ s9.4c
Daubenton's bat	<i>Myotis daubentonii</i>	10	2024	WACA-Sch5-s9.4b/ s9.4c

Natterer's bat	<i>Myotis nattereri</i>	6	2024	WACA-Sch5-s9.4b/ s9.4c
Leisler's bat	<i>Nyctalus leisleri</i>	1	2021	
Noctule bat	<i>Nyctalus noctula</i>	68	2024	WACA-Sch5-s9.4b/ s9.4c, NERC_s41
Nathusius' pipistrelle	<i>Pipistrellus nathusii</i>	4	2024	WACA-Sch5-s9.4b/ s9.4c
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	126	2024	WACA-Sch5-s9.4b/ s9.4c
Soprano Pipistrelle	<i>Pipistrellus pygmaeus</i>	102	2024	WACA-Sch5-s9.4b/ s9.4c NERC_s41
Brown long-eared	<i>Plecotus auritus</i>	86	2024	WACA-Sch5-s9.4b/ s9.4c, NERC_s41
Mammals (Excl. bats)				
Hedgehog	<i>Erinaceus europaeus</i>	4	2023	NERC_s41
Badger	<i>Meles meles</i>	18	2024	Badgers-1992

Table 3b. Species status key.

Abbreviation	Legislation
BOCC-Red	Birds of Conservation Concern Red list – Globally threatened according to IUCN criteria; those whose population or range has declined rapidly in recent years; and those that have declined historically and not shown substantial recovery.
HabReg-Sch2	Schedule 2 of Conservation of Habitats and Species Regulations 2010 (European Protected Species animal) – It is an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2.
NERC-S41	Priority Species listed under Section 41 of the Natural Environment and Rural Communities Act 2006.
Badgers-1992	Protection of Badgers Act 1992 – Badgers and their setts are protected; making it illegal to kill, injure or take, possess or cruelly ill-treat badgers or to interfere with a badger sett
WACA-Sch1-p1	Schedule 1 Part 1 of the Wildlife and Countryside Act 1981 (as amended) – Birds protected from disturbance at their nests, or their dependent young.
WCA_5s91k	Schedule 5 Section 9 Part 1 (taking) of the Wildlife and Countryside Act 1981 (as amended) – Animals which are protected from being intentionally killed or injured.
WCA_5s9_4b/c	Schedule 5 Section 9 Parts 4b/c of the Wildlife and Countryside Act 1981 (as amended) – Animals which are protected from intentional disturbance while occupying a structure or place used for shelter or protection / Animals which are protected from their access to any structure or place which they use for shelter or protection being obstructed.

6.2.2 On MAGIC there were records of eleven bat mitigation licences that had been granted within the last 10 years inside a 2-kilometre radius of the application site. The licences permitted work affecting common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and brown long-eared (*Plecotus auritus*). Two of these licences covered work affecting breeding sites for all species at residential sites situated approximately 1450 metres southwest (Reference: 2019-39174-EPS-MIT) and 1700 metres southeast (Reference: 2018-37292-EPS-MIT). The closest granted licence for a non-breeding site is situated approximately 800 metres to the east (Reference: 2017-31789-EPS-MIT).

6.2.3 OS mapping shows that there are two ponds within a 500m radius of the site: situated approximately 210 metres to the east and 460 metres to the southeast. A water-filled ditch is also situated approximately 440 metres to the north. The site falls within an “Amber” Zone on the NatureSpace Great Crested Newt Impact Risk Zone mapping which indicates the area is likely to contain important habitat for newts.

6.3 Historic and Current Land Use

- 6.3.1** Google Satellite imagery dating back to 1985 shows that the application site to comprise woodland throughout that period, with clearance visible in 2013 but this area is wooded at other times during the imagery.

7 UK HABITAT CLASSIFICATION SURVEY

7.1 Overview

7.1.1 The application site is within a semi-rural setting and covers 0.15ha of felled woodland. The site was immediately surrounded by mixed woodland (mapped as priority habitat) with a residential garden to the south, Range Road to the west, and further mixed woodland to the north and east.

7.1.2 The following UK Habitat Classification (UKHab) habitats were observed during the site walkover: w1~206 Felled.

7.1.3 The UKHab primary habitats and secondary codes are described alongside photographs (see **Photographs 1 - 5**) and a survey plan (see **Figure 1**), as follows:

7.2 w1~206 Felled

32 Scattered trees, 207 Forest brash, 612 Fence

7.2.1 The centre of the site was a felled section of the woodland with satellite imagery showing the clearance to have taken place recently (**Photograph 1 & Image 2**); however, imagery shows an opening centrally in 2013, although the area is wooded at other times since 1999. Piles of the resulting brash were situated along the edge of the clearing. Scattered birch (*Betula* sp.), poplar (*Populus* sp.) and willow (*Salix* sp.) trees were situated within the northeastern corner of the clearing and the access to Range Road was blocked by Heras fencing (**Photograph 5**).



Photograph 1. Felled section of woodland with brash piles around margin and occasional scattered trees (w1~206).



Image 2. Google earth satellite imagery dated 05/09/2025, georeferenced over the site boundary.



Photograph 3. Access to Range Road blocked by Heras fencing.

7.3 w1h Other woodland; mixed (Offsite)

7.3.1 The immediate surrounding habitat comprised a section of mixed woodland mapped on MAGIC as broadleaved priority habitat (Habitat of principle importance under Section 41 of the NERC Act 2006) (Photographs 4 & 5). Species present throughout the woodland included Scots pine (*Pinus sylvestris*), silver birch (*Betula pendula*), willow (*Salix caprea*), poplar (*Populus* sp.), oak (*Quercus robur*) and hazel (*Corylus avellana*). Bracken (*Pteridium aquilinum*), was abundant in the ground flora with occasional bramble (*Rubus fruticosus* agg.), holly (*Ilex aquifolium*) saplings, pendulous sedge (*Carex pendula*), wood sedge (*Carex sylvatica*), creeping bent (*Agrostis stolonifera*), rough meadow grass (*Poa trivialis*), male fern (*Dryopteris filix-mas*) and foxglove (*Digitalis purpurea*).

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Photograph 4. Boundaries of mixed woodland (w1h).



Photograph 5. Mixed woodland (w1h).

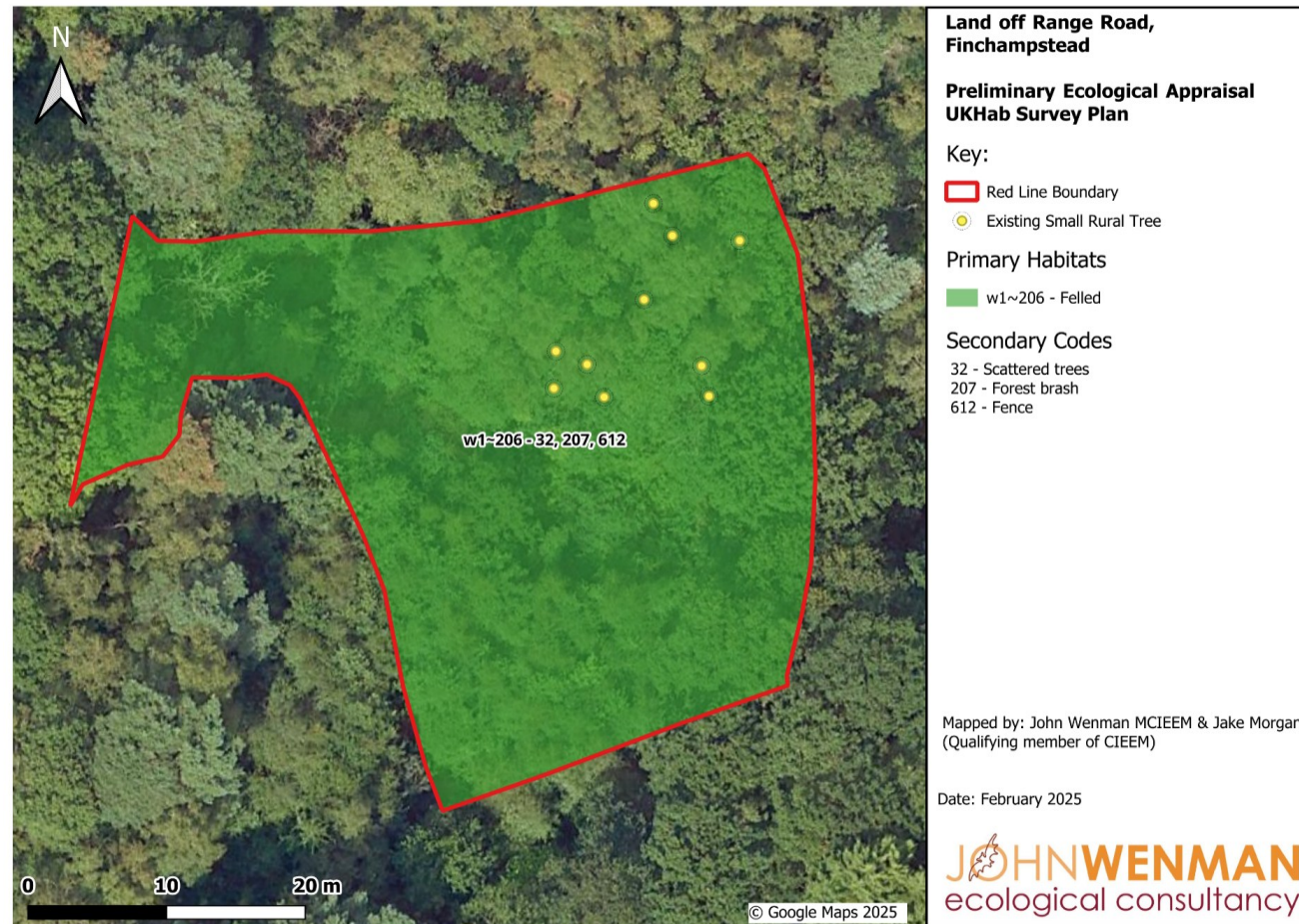


Figure 1. UKHab Survey Plan.

8 DISCUSSION

8.1 Designated Sites for Nature Conservation

Evaluation of Baseline

- 8.1.1** The desk study revealed that the application site is not statutorily or non-statutorily designated for its wildlife interest and therefore not currently recognised as being of international, national or county level conservation significance. However, the site does fall within impact risk zones (IRZ) for Longmoor Bog SSSI and Heathlake SSSI.
- 8.1.2** The desk study data included three locally designated Local Wildlife Sites (LWSs) within a 1 kilometre radius of the application site; the closest is Land to the east and west of Sandhurst Road LWS approximately 250m to the northeast.

Impact Assessment

- 8.1.3** The proposals (i.e. erection of a single caravan plot with associated buildings) do not correspond with the categories of development that are likely to have an impact on the SSSIs within the 2km search area. Furthermore, considering the nature, scale and distance of the proposals, no adverse effects are anticipated on the nearby locally designated sites.
- 8.1.4** The site falls within the 400m to 5km zone of influence around the Thames Basin Heaths SPA. Within this zone, a net increase in residential dwellings is considered to have an impact on the SPA because of increased visitor pressure on the SPA, and therefore financial contributions to mitigation measures (i.e. the creation of Suitable Alternative Greenspaces (SANGs) and Strategic Access Management and Monitoring (SAMM)) may be required by Wokingham Borough Council as a legal agreement attached to a planning consent.

8.2 Habitats

Evaluation of Baseline

- 8.2.1** The application site is primarily characterised by a section of felled woodland (w1~206) i.e. a habitat of high distinctiveness. The scattered trees, remnants of the former woodland within the cleared area, are also habitats of medium distinctiveness.
- 8.2.2** The surrounding mixed woodland that supports a high proportion of native broadleaved trees, with areas of dense young growth in places, is largely mapped as priority woodland (NERC Act 2006 habitats of principle importance) on MAGIC and is a habitat of medium distinctiveness.

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- 8.2.3** Aerial photography suggests that the felled area has likely comprised broadleaved woodland throughout most of the last 27 years, with a short period of clearance in 2013, therefore its ecological value has declined following clearance. The woodland forms part of a larger complex of broadleaved and coniferous woodlands extending to the north and north east and to the south of Nine Mile Ride, and as such, is unlikely to be of high importance locally and not of ecological importance beyond the local level.

Impact Assessment

- 8.2.4** The proposals have a risk of harm to the surrounding off-site woodland. As such, the boundaries and onsite scattered trees along the eastern site boundary should be protected from harm during the work – refer to recommendations in **Section 9.2**. The proposed development will need to demonstrate a minimum of 10% net gain for biodiversity – refer to **Section 9.2**.

8.3 Bats

Evaluation of Baseline

- 8.3.1** Eleven bat mitigation licences have been granted within the last 10 years inside a 2-kilometre radius of the application site. Two of these comprise breeding sites for all species at residential sites situated approximately 1450 metres southwest (Reference: 2019-39174-EPS-MIT) and 1700 metres southeast (Reference: 2018-37292-EPS-MIT). The closest licence for a non-breeding site is situated approximately 800 metres to the east (Reference: 2017-31789-EPS-MIT). Furthermore, TVERC returned records of ten species within the last 10 years, including barbastelle (*Barbastella barbastellus*), serotine (*Eptesicus serotinus*), Daubenton's bat (*Myotis daubentonii*), Natterer's bat (*Myotis nattereri*), Leisler's bat (*Myotis leisleri*), noctule (*Nyctalus noctula*), Nathusius's pipistrelle (*Pipistrellus nathusii*), common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*), and brown long-eared (*Plecotus auritus*).
- 8.3.2** The trees within the mixed woodland were of a range of ages with young growth and mature trees of a size sufficient to have potential bat roost features (PRFs). Furthermore, the site offers excellent foraging and commuting habitats for bats that may be roosting locally, especially given the proximity of nearby housing. However, it is highly unlikely to resemble an important resource for bats beyond the scale of the site given the context of the extensive woodland in the surrounding area.

Impact Assessment

- 8.3.3** The retained scattered trees and off-site woodland are not to be directly impacted by the proposed caravan site, however, the felled section of woodland to facilitate this has resulted in a reduced foraging habitat area onsite. As such, the proposed development should incorporate a sensitive lighting scheme to prevent the loss of further potential flight paths and suitable foraging habitats, as well as potential roosting spots within the woodland and some additional provision of roosting opportunities should be provided within the retained woodland – refer to **Sections 9.3 & 9.5**.

8.4 Great Crested Newts (and other amphibians)

Evaluation of Baseline

- 8.4.1** Whilst the desk study data included no recent great crested newt (GCN) records within a 1 kilometre radius of the application site, the NatureSpace District Level Licensing Impact Risk Zon map for Berkshire shows the site falling within an amber zone, i.e. where GCN are likely to be present.
- 8.4.2** There is no suitable amphibian breeding habitat on site (i.e. standing water) and the closest potential breeding pond visible on OS mapping is situated approximately 210 metres to the east. The felled woodland habitat and surrounding mixed woodland resembles suitable terrestrial habitat for amphibians.

Impact Assessment

- 8.4.3** The off-site woodland will not be impacted by the proposals and will provide continued habitat to be used by dispersing newts in their terrestrial phase avoiding further fragmentation of local habitats. The Natural England Rapid Risk Assessment Tool was used to assess the risk of the proposals adversely affecting GCN. Under the assumption that the ponds within 500m of the application site are GCN breeding ponds, the Tool indicates that the loss of or damage to 0.15ha of land (i.e. the felled section of woodland) to development is highly unlikely to result in an offence (see **Table 4** below).

Table 4. Great Crested Newt Rapid Risk Assessment Tool.

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	0.1 - 0.5 ha lost or damaged	0.1
Land >250m from any breeding pond(s)	0.1 - 0.5 ha lost or damaged	0.005
Individual great crested newts	No effect	0
	Maximum:	0.1
Rapid risk assessment result:	GREEN: OFFENCE HIGHLY UNLIKELY	

Guidance on risk assessment result categories

"Green: offence highly unlikely" indicates that the development activities are of such a type, scale and location that it is highly unlikely any offence would be committed should the development proceed. Therefore, no licence would be required. However, bearing in mind that this is a generic assessment, you should carefully examine your specific plan to ensure this is a sound conclusion, and take precautions (see **Non-licensed avoidance measures tool**) to avoid offences if appropriate. It is likely that any residual offences would have negligible impact on conservation status, and enforcement of such breaches is unlikely to be in the public interest.

- 8.4.4** The proposals are considered highly unlikely to result in an offence to GCN, particularly if non-licensed avoidance measures are adopted during the work (refer to recommendations in **Section 9.4**).

8.5 Hazel Dormouse*Evaluation of Baseline*

- 8.5.1** The desk study data included no recent hazel dormouse records within a 1 kilometre radius of the application site and a search of MAGIC for granted EPS licence applications returned none within a 2km radius.
- 8.5.2** The woodland mostly lacked the structural diversity i.e. established shrub layer, and connectivity to support a population of hazel dormice and so the presence of hazel dormouse on site is considered to be highly unlikely.

Impact Assessment

- 8.5.3** The risk of hazel dormouse presence on site is extremely low and therefore no adverse effects on this species are anticipated.

8.6 Reptiles*Evaluation of Baseline*

- 8.6.1** The desk study data included recent records of slow-worm (*Anguis fragilis*), grass snake (*Natrix helvetica*), adder (*Vipera berus*) and common lizard (*Zootoca vivipara*), the closest of which are on from land situated approximately 550m to the south, 780m to the southeast, 920m to the northeast, and 960m to the south respectively. The site comprises fairly shaded woodland habitat of low suitability for basking reptiles. Due to

the recent clearance, it is considered unlikely that reptiles are currently present within the proposed development area, but there is scope for them to be present incidentally within the surroundings mixed woodland although the site is unlikely to be of conservation importance to reptiles locally.

Impact Assessment

- 8.6.2** The risk of reptile presence on site is low and the proposals are considered highly unlikely to result in an offence, however, there is a chance that individual reptiles may be present on the site and therefore non-licensed avoidance measures should be adopted during the construction (refer to recommendations in **Section 9.4**).

8.7 Birds

Evaluation of Baseline

- 8.7.1** The desk study data included recent records of protected and notable bird species within a 1 kilometre radius of the application site. The retained scattered trees and off-site woodland provides foraging opportunities and some nesting opportunities for common and widespread bird species, including notable species typical of wooded habitats such as the locally recorded dunnock (*Prunella modularis*) and bullfinch (*Pyrrhula pyrrhula*) – priority species under Section 41 of the NERC Act 2006 - but in the context of extensive woodland habitats in the wider area, the site is unlikely to support a bird assemblage of conservation importance.

Impact Assessment

- 8.7.2** Whilst the scattered trees that remain within the felled section of woodland are to be retained, some provision for nesting birds should be included in the retained off-site woodland (see **Section 9.5**).

8.8 Badgers (and other mammals)

Evaluation of Baseline

- 8.8.1** The desk study data included 18 recent records of badger within a 1km radius, the only non-confidential record being situated approximately 250m to the northwest. The nearest record for hedgehog – a priority species (Species of principle importance under Section 41 of NERC Act 2006) – is approximately 440m to the southwest within a residential area.
- 8.8.2** No evidence of badger activity (i.e. setts, trails, snuffle holes or mammal diggings) was identified within the application site but it is not possible to rule out badger activity within the nearby woodland and it is possible that badgers and hedgehogs within the

nearby area may forage or take cover onsite.

Impact Assessment

- 8.8.3** The risk of protected mammal presence on site is negligible and as such, no adverse effects are foreseen. Precautionary measures should be adopted to prevent injury/death of sheltering hedgehogs (see **Section 9.4**) and ecological permeability across the site should be maintained (see **Section 9.5**).

8.9 Invertebrates

Evaluation of Baseline

- 8.9.1** The desk study data included local records of stag beetle (*Lucanus cervus*) – a species of principal importance for conservation under Section 41 of the NERC Act 2006 - within 200m of the site. The brash piles resulting from the felled section of woodland, as well as the off-site woodland itself, offers habitats that could support stag beetle and a range of native invertebrate species typical of lowland woodland although, considering its small size and in the context of extensive woodland in the surrounding area it is unlikely to support an assemblage of invertebrates of conservation importance.

Impact Assessment

- 8.9.2** Whilst the proposed development will involve the removal of the brash piles, the higher value woodland off-site is to be retained and so the proposals are unlikely to have a significant impact on habitats important for invertebrates, especially if enhancements to benefit locally recorded invertebrate priority species are undertaken – refer to **Section 9.5**.

9 RECOMMENDATIONS

9.1 Overview

- 9.1.1** This chapter provides the details regarding proposed avoidance, mitigation, compensation and enhancement measures; including measures to enable legislative compliance.

9.2 Habitats

Biodiversity Net Gain

- 9.2.1** To meet the mandatory requirement of a minimum 10% net gain for biodiversity, offsite gains will need to be made by either purchasing units from a habitat bank or utilising land outside of the application site but under the applicant's ownership.

Protection measures

- 9.2.2** Protection measures should be adopted during construction to prevent damaging the scattered trees and off-site woodland. The habitat protection measures during construction activities deemed appropriate and proportionate to the nature and scale of the proposed development are as follows:
- Erecting Heras fencing enclosing Root Protection Areas (RPAs);
 - Directing security/construction lighting away from the scattered trees and woodland;
 - Storing equipment that could cause pollution safely and securely on hard surfaces;
 - Adopting procedures to avoid pollution incidents, e.g. fuel spills or surface runoff;
 - Storing materials on existing hard surfaces to avoid compaction of; and
 - Stopping and seeking advice from a suitably qualified ecologist if protected species are encountered during construction.

9.3 Bats

- 9.3.1** During construction, artificial lighting should be avoided, or if considered to be essential, kept to a minimum and if security lighting is required, this should be controlled by passive infrared motion sensors.
- 9.3.2** In the long-term, external lighting should be avoided wherever possible but if essential, factors such as height, light source, use of passive infrared motion sensors and light spillage should be considered carefully as part of the design of a sensitive lighting strategy. As part of the strategy, if lighting is required, lighting with low or no UV content, i.e. warm white LED lamps (2700K or below), should be used in place of mercury and metal halides and luminaires or other directional light accessories should be used to

ensure that light spillage onto the scattered trees and woodland is avoided (BCT and ILP, 2023). The lighting should be directed away from the scattered trees and woodland.

9.4 Amphibians, Reptiles and Small Mammals (Reasonable Avoidance Measures)

9.4.1 The following reasonable avoidance measures will be adopted to minimise the risk of harming amphibians, reptiles and small mammals:

Before construction

- Any removal of debris and brash will be carefully searched by hand looking for amphibians, hedgehogs and reptiles.

During construction

- Any stored building materials or waste, such as bricks or debris etc., that might offer shelter for amphibians, hedgehogs and reptiles will be kept raised off the ground on pallets or on existing hard standing, and efforts should be made to process and remove these from site as soon as possible; and
- Excavation works will be avoided after dusk and any open excavations or trenches will be backfilled (after a check for amphibian/reptile presence) or left with escape ramps to prevent animals from becoming trapped.

9.5 Biodiversity Enhancement Measures

9.5.1 The planning proposals provide opportunities for the enhancement of the site's biodiversity value. The inclusion of the following recommendations would be of ecological benefit and be in line with the National Planning Policy Framework (NPPF) and local planning policy:

- Creation of a stag beetle loggery in the corners of the site by partially burying logs of native trees in the ground (approx. 50cm depth);
- Installation of bat and bird boxes on the retained mature scattered trees or trees within the off-site woodland; and
- Ensuring ecological permeability for hedgehogs across the site, i.e. using post and rail fencing or creating 13cm x 13cm holes in timber panels.

10 BIODIVERSITY NET GAIN ASSESSMENT

10.1 Overview

10.1.1 This chapter provides the details of the completed Statutory Biodiversity Metric calculation tool showing the pre-development and post-development biodiversity value of the onsite habitat.

10.2 Baseline Habitats

10.2.1 The UK Habitat Classification (UKHab) habitats identified during the field survey have been assigned condition and strategic significance as shown in **Table 5** below; a plan of these baseline habitats for the biodiversity metric tool is illustrated in **Figure 2** below.

Table 5. Baseline habitats for the biodiversity metric tool.

Habitat Type (UKHab code)	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Area (ha)	Habitat Units
Felled (w1~206)	High	Good	High	0.1491	3.05
Medium rural tree	Medium	Good	High	0.0407	0.56
Total				0.1491 (excl. rural trees)	3.61

10.2.2 Felled woodland is automatically assigned good condition and is representative of a high distinctiveness habitat (w1~206). The medium native trees were assigned good habitat condition (see condition assessment sheet) and as part of a former woodland habitat, were classified as being of high strategic significance.

10.3 Proposed Habitats

10.3.1 The proposed habitats derived from the proposed site plan (see **Appendix 2**) are listed in **Table 6** and described below; a plan of these proposed habitats for the biodiversity metric tool is illustrated in **Figure 3** below.

Table 6. Proposed habitats for the biodiversity metric tool.

Habitat Type (UKHab code)	Delivery	Habitat Distinctiveness	Habitat Condition	Strategic Significance	Area (ha)	Habitat Units
Developed land – sealed surface (u1b)	Creation	Very low	N/A	Low	0.0093	0.00
Artificial unvegetated, unsealed surface (u1c)	Creation	Very low	N/A	Low	0.133	0.00
Other woodland; broadleaved (w1g)	Creation	Medium	Poor	High	0.0023	0.01
Medium rural tree	Retention	Medium	Good	High	0.0407	0.56
Area retained (excluding individual trees)					0.1491 (excl. rural trees)	0.57 (-3.04)

u1b Developed land – sealed surface

- 10.3.2** The proposed development comprises a proposed caravan, touring caravan and two outbuildings.

u1c Artificial unvegetated, unsealed surface

- 10.3.3** The proposed development will replace 0.1468ha of the Felled woodland (w1~206) with a permeable hard surface.

w1g Other woodland; broadleaved

- 10.3.4** The proposed development includes replacing 0.0023ha of the felled woodland (w1~206) with broadleaved woodland planting. This will achieve a “poor” condition within 5 years of planting due to the restrictions of the area.

Individual trees

- 10.3.5** All scattered trees will be retained as part of the proposals.



Figure 2. Baseline habitats plan.

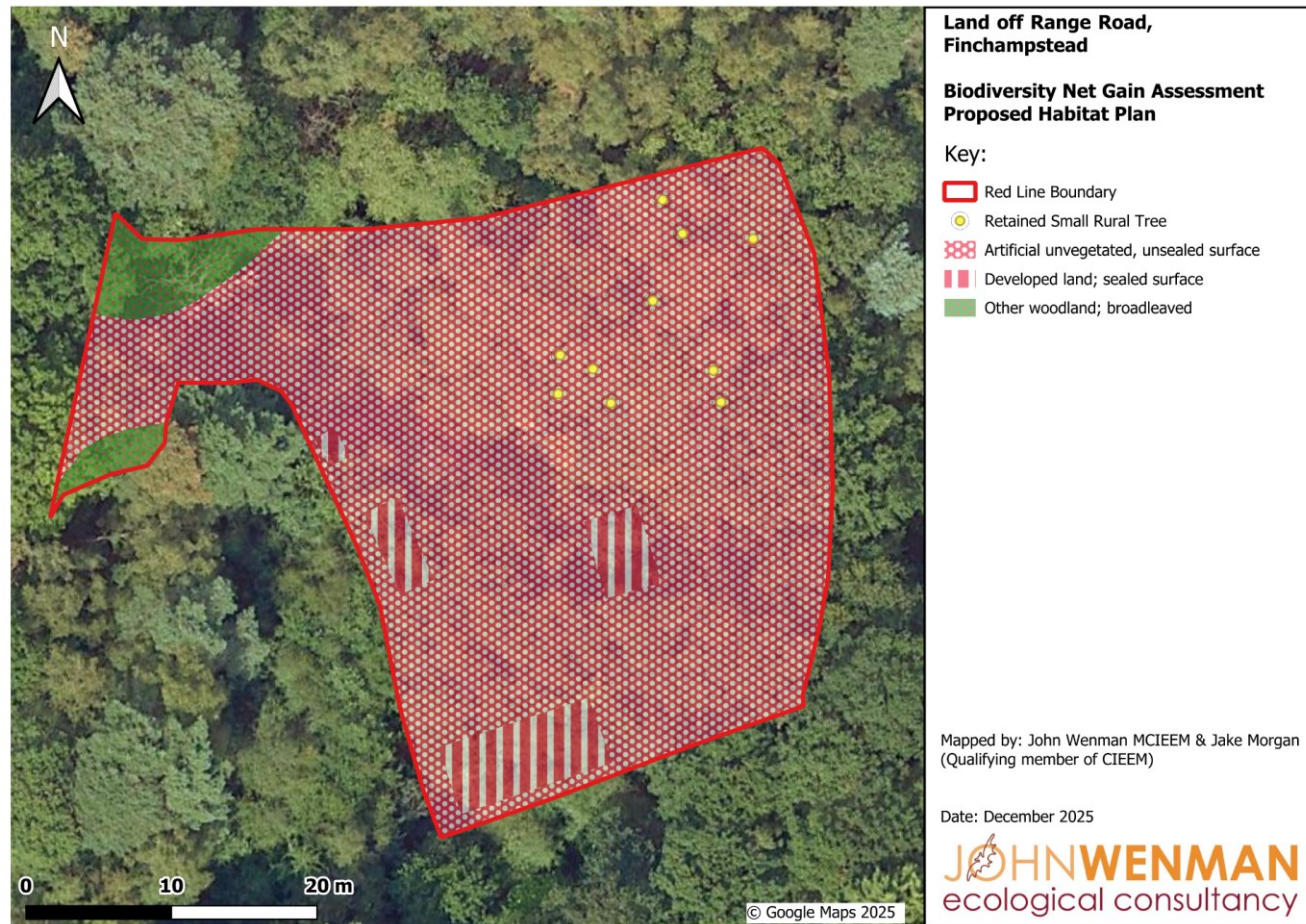


Figure 3. Proposed habitats plan.

10.4 Calculation Result

10.4.1 The Biodiversity Metric calculation tool demonstrates that the feasibility of delivering a minimum of 10% onsite net gain for biodiversity is not currently possible within the scope of the proposals– see metric calculation tool enclosed separately.

10.4.2 The results taken from the tool shows a total onsite net change of -83.81% and a loss of -3.06 in habitat units. This translates to a deficit of 3.42 habitat units for achieving a 10% net gain for the site – see **Figure 3** below.

Headline Results		Return to results menu	
Scroll down for final results ▲			
On-site baseline	Area habitat units	3.65	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.59	
	Hedgerow units	0.00	
	Watercourse units	0.00	
On-site net change (units & percentage)	Area habitat units	-3.06	-83.81%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Off-site baseline	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site post-intervention (Including habitat retention, creation & enhancement)	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Off-site net change (units & percentage)	Area habitat units	0.00	0.00%
	Hedgerow units	0.00	0.00%
	Watercourse units	0.00	0.00%
Combined net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-3.06	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Spatial risk multiplier (SRM) deductions	Area habitat units	0.00	
	Hedgerow units	0.00	
	Watercourse units	0.00	
FINAL RESULTS			
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-3.06	
	Hedgerow units	0.00	
	Watercourse units	0.00	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Area habitat units	-83.81%	Total net gain achieved is less than target set ▲
	Hedgerow units	0.00%	
	Watercourse units	0.00%	
Trading rules satisfied?	No - Check Trading Summaries ▲		
Unit Type	Target	Baseline Units	Units Required
Area habitat units	10.00%	3.65	4.01
Hedgerow units	10.00%	0.00	0.00
Watercourse units	10.00%	0.00	0.00
Unit Deficit			
No additional hedgerow units required to meet target ✓			
No additional watercourse units required to meet target ✓			

Figure 4. Final Results taken from the Statutory Biodiversity Metric calculation tool.

10.4.3 There is no scope for habitat creation within the current proposals to compensate for this deficit of units and therefore habitat creation and enhancements would need to be delivered offsite.

10.4.4 To meet the mandatory requirement of a minimum of 10% net gain for biodiversity,

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offsite gains will need to be made by either purchasing units from a land manager or utilising land outside of the application site but under the applicant's ownership that is not within a residential curtilage i.e. offsite land, which can be registered and secured for 30 years.

11 REFERENCES AND BIBLIOGRAPHY

- Bat Conservation Trust and Institute of Lighting Professionals (2023). *Guidance Note 08/23: Bats and artificial lighting at night*. ILP, Rugby.
- Bright, P., Morris, P. & Mitchell-Jones T. (2006). *The dormouse conservation handbook – second edition*. English Nature.
- CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal, 2nd edition*. Chartered Institute of Ecology and Environmental Management, Winchester
- Collins, J. (ed.) (2023). *Bat Surveys for Professional Ecologists – Good Practice Guidelines*. 4th Edition. Bat Conservation Trust, London.
- English Nature (2001). *Great crested newt mitigation guidelines*. English Nature, Peterborough.
- Froglife (1999). Froglife Advice Sheet 10: Reptile Survey: An introduction to planning, conducting and interpreting surveys for snake and lizard conservation. Froglife, Halesworth.
- Langton, T., Beckett, C. & Foster, J. (2001). *Great Crested Newt Conservation Handbook*. Froglife, Halesworth.
- Reason, P.F. and Wray, S. (2025). *UK Bat Mitigation Guidelines: a guide to impact assessment, mitigation and compensation for developments affecting bats*. Version 1.2 Chartered Institute of Ecology and Environmental Management, Ampfield.
- Mitchell-Jones, A. J. & McLeish, A. P. (2004). *Bat Workers' Manual (3rd Edition)*. JNCC, Peterborough.
- UKHab Ltd. (2023). The UK Habitat Classification User Manual Version 2.0 at <http://www.ukhab.org/>

APPENDIX 1 – LEGISLATIVE BACKGROUND

Amphibians

The seven native species of amphibian receive protection under the W&AC 1981 (as amended). The four widespread and common amphibians (common frog, toad, smooth newt and palmate newt) receive only limited protection – making their sale illegal.

The great crested newt (*Triturus cristatus*) receives full protection under the W&CA 1981 (as amended) and under the Habitat Regulations 2017. The combined legislation makes it illegal to:

- intentionally or recklessly kill, injure or take a great crested newt;
- possess or control any live or dead specimen or anything derived from a great crested newt;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a great crested newt; and
- intentionally or recklessly disturb great crested newts; in particular, any disturbance which is likely to impair their ability to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating animals, to hibernate or migrate.

Great crested newts (*T. cristatus*) and common toads (*Bufo bufo*) are species of principal importance for the conservation of biodiversity in England ('UKBAP Priority Species') under Section 41 of the NERC Act 2006.

Badgers

Badgers are protected by the Protection of Badgers Act 1992. The Act makes activities such as development that would harm or disturb badgers or damage, obstruct or destroy their setts illegal. If badgers are to be affected by the proposed development, activities can be undertaken only under a licence issued by Natural England.

Bats

All bat species in Britain are fully protected by the W&CA 1981 (as amended) and by the Habitat Regulations 2017. In summary, the combined legislation makes it an offence to:

- damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a bat;
- deliberately, intentionally or recklessly disturb bats; in particular, any disturbance which is likely to impair the ability of bats to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate; or to significantly affect the local distribution or abundance of the species; and

- deliberately kill, injure or take any bat.

Birds

All wild birds are protected under the W&CA 1981 (as amended). The Act makes it an offence to kill, injure or take a wild bird or to damage or destroy the nest of a wild bird whilst in use or being built. Species listed on Schedule 1 of the Act, such as barn owls and kingfishers, are afforded additional protection against disturbance while nesting.

Hazel dormice

Hazel dormice receive full protection under the W&CA 1981 (as amended) and under the Habitat Regulations 2017. These make it illegal to:

- intentionally or recklessly kill, injure or take a dormouse;
- possess or control any live or dead specimen or anything derived from a dormouse;
- damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a dormouse; and
- intentionally or recklessly disturb dormice; in particular, any disturbance which is likely to impair their ability to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating animals, to hibernate or migrate.

Invasive non-native plants

The W&CA 1981 (as amended) provides the primary controls on the release of non-native species into the wild in Great Britain. It is an offence under Section 14(2) of the Act to 'plant or otherwise cause to grow in the wild' any plant listed in Schedule 9, Part II. The species listed in the Act include Japanese knotweed (*Fallopia japonica*), giant hogweed (*Heracleum mantegazzianum*) and Himalayan balsam (*Impatiens glandulifera*).

Otters

Otters are fully protected by the W&CA 1981 (as amended) and by the Habitat Regulations 2017. In summary, the combined legislation makes it an offence to:

- damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by an otter;
- deliberately, intentionally or recklessly disturb otters; in particular, any disturbance which is likely to impair the ability of otters to survive, breed or reproduce or nurture their young; or to significantly affect the local distribution or abundance of the species; and
- deliberately kill, injure or take any bat.

Reptiles

The four widespread reptiles most likely to be encountered (adder, grass snake, slow worm and common lizard) are protected under the W&CA 1981 (as amended). The Act makes it an offence to intentionally kill, injure, possess or sell any of the species.

The aforementioned species are all listed as being of principal importance for the conservation of biodiversity in England ('*UKBAP Priority Species*') under Section 41 of the NERC Act 2006.

Water voles

Since April 2008, water voles have received full protection under Section 9 in Schedule 5 of the W&CA 1981 (as amended). This makes it an offence to intentionally kill, injure or take water voles or to possess or control live or dead water voles or derivatives. It is an offence to intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection or intentionally or recklessly disturb water voles whilst occupying a structure or place used for that purpose.

The water vole is listed as being of principal importance for the conservation of biodiversity in England ('*UKBAP Priority Species*') under Section 41 of the NERC Act 2006.

Wild mammals

Under the Wild Mammals (Protection) Act 1996 it is an offence to intentionally inflict unnecessary suffering, as specified by the Act, on any wild mammal.

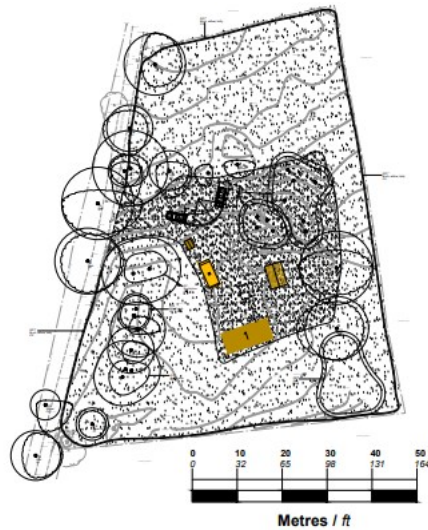
APPENDIX 2 – PROPOSED SITE LAYOUT



Location Plan
Scale 1:1250

NOTES
Without dimensions only are to be used from this drawing. It is the responsibility of the user to ensure that the drawing is used in accordance with the relevant standards.
Dimensions and scale are not to be used for any other purpose than that for which they are intended.
Dimensions are not responsible for showing any of any discrepancy shown on the drawing to indicate the drawing and any other related documents to be used in respect of the work.
This drawing and the copyright and all rights are reserved by the user and may be used in accordance with a copy licence.
All work must be carried out in accordance with the current Building Regulations, Codes of Practice and British Standards. If any doubt exists the user must refer to the manufacturer.
The Construction Design and Management Regulations 2015 is to be followed by the user in the event of any discrepancy between the drawing and the relevant standards.
Consent to modify the drawing is given by the user and all the user must ensure that the drawing is used in accordance with the relevant standards.
It is the responsibility of the user to ensure that the drawing is used in accordance with the relevant standards.
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A - Minor Amendment		16-01-2026
Proposed Gypsy Pitch On Available Land on Range Road Finchampstead, RG40 3NP		mpas
Client: ET Planning Thames Valley - 200 Dukes Road, Crowthorne, RG45 8DS		Martin Peacock Architectural Services Limited
Drawing: Location Plan		16-01-2026
Drawn: JWP	Date: 2025-58	Drawing No: 400
Scale: 1:1250 (A4)		Revised: A
Date: 27-11-2025		



Site Layout
Scale 1:500

NOTES

1. This drawing is a preliminary site layout and should not be used for planning or other legal purposes without the approval of the relevant authorities.

2. The site layout is based on the information provided by the client and the consultant. The consultant does not accept liability for any errors or omissions in the information provided.

3. The site layout is subject to change without notice.

4. The site layout is not a guarantee of the accuracy of the information provided.

5. The site layout is not a guarantee of the accuracy of the information provided.

6. The site layout is not a guarantee of the accuracy of the information provided.

7. The site layout is not a guarantee of the accuracy of the information provided.

8. The site layout is not a guarantee of the accuracy of the information provided.

9. The site layout is not a guarantee of the accuracy of the information provided.

10. The site layout is not a guarantee of the accuracy of the information provided.

Key	
Existing Landscaping (Trees)	
Existing Landscaping (Low Level Planting / Hedge)	
Existing Caravan	
Application Boundary	
Proposed Permeable Track / Surface	
Proposed Landscaping	
Proposed Landscaping (Low Level planting and hedges)	
Touring Caravan	
Proposed Caravan	
Proposed Day Room	
Proposed Bin Store	

B Amended To Client Requirements		08-12-2025
A Amended To Client Requirements		08-12-2025
Contract		mpas
Proposed Gypsy Pitch On Available Land on Range Road Finchampstead. RG40 3NP		
Client		Martin Peacock Architectural Services Limited
Drawing		Site Layout As Proposed
Drawn		MDP
Scale		1:500 @A2
Date		27-11-2025
Job No		2025-58
Drawing No		501
Revision		B