

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	261171
Address:	Charlton Lane, Swallowfield, Berkshire.		
Proposal:	Full application for the change of use of land to a caravan site for the proposed erection of 5no. gypsy and traveller pitches, each incorporating a static caravan, touring caravan, single-storey day room, bin store, associated parking, access, boundary treatment, hardstanding and hard and soft landscaping.		
Type of Development:	Minor Gypsy and traveller pitches (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

Documents reviewed in support of this application:

- Biodiversity Net Gain Statement, 17th April 2026 by EDM Planning
- Site Layout as Proposed, 15th May 2025 by Martin Peacock Architectural Services Limited
- Preliminary Ecological Appraisal, 6th April 2026 by EDM Planning
- Habitat Assessment Plan
- Statutory Biodiversity Metric, 14th April 2026 by Chris Nixon on behalf of EDM Planning

Statutory Biodiversity Net Gain

A Biodiversity Net Gain Statement and associated metric has been submitted. However, there are some concerns regarding the baseline and post development scenario.

The applicant ecologist provides in depth historic baseline and use of the site, which does provide context on how the site has been used historically and disturbed. However, no condition sheets have been provided to support the baseline habitat categorisation which is required under the biodiversity net gain government guidance.

Additionally, although biodiversity net gain is a pre-commencement condition, the LPA must still be satisfied at the application stage that the development is capable of achieving the mandatory 10% Biodiversity Net Gain required under the

Environment Act 2021.

As currently presented, the proposed post-development scenario does not provide sufficient confidence that this can be achieved. The metric indicates that entirety of the existing grassland will be retained in its current condition; however, this appears unrealistic given that the proposal includes the installation of caravan pitches, day rooms, access arrangements and associated infrastructure, all of which are likely to require some degree of ground preparation, hardstanding and habitat loss. Furthermore, the individual plots would constitute private residential curtilages.

In accordance with the Statutory Biodiversity Metric User Guide, habitats within private gardens cannot generally be relied upon to deliver and secure Biodiversity Net Gain in the same way as retained or managed habitat areas. As such, these areas should be more appropriately assessed as habitat loss and conversion to vegetated garden, or potentially hardstanding where ground surfacing is required. Consequently, the proposed post-development scenario does not appear to accord with the Statutory Metric User Guide and cannot currently be relied upon to demonstrate that the development is capable of delivering a compliant Biodiversity Net Gain outcome.

The following revisions are required:

- Provide completed condition assessment sheets for all baseline habitats, including clear justification for the habitat types and condition scores assigned, in accordance with the Statutory Biodiversity Metric User Guide.
- Revise the biodiversity metric to reflect a realistic post-development scenario, including any habitat loss, hardstanding and private curtilage areas. Demonstrate how the proposed habitat condition will be met and to justify that the relevant metric criteria can be achieved and maintained.
- Metric indicates trees as lost, but BNG report indicate trees as retained, requires revision for consistency.
- Metric indicates neutral grassland as created habitat. The location of the neutral grassland overlaps area as modified grassland, should this not be considered enhancement for certain areas?
- The site layout plan (May 2025, Martin Peacock Architectural Services Limited) indicates the open space will have a refuse collection point on the open space, the metric should reflect this as reduce the size of the proposed neutral grassland.
- The open space is small in size, I do not believe that 10 trees in moderate condition can be secured for a 30-year period. The applicant will need to demonstrate how this is achievable in this small space of land.

Protected Species

Bats

All bats and their roosts are legally protected by national and European legislation including Wildlife and Countryside Act 1981 and Conservation of Habitats and Species Regulations 2017. Additionally, several species of bats are a priority species under the NERC Act 2016. These legislations make it illegal to deliberately disturb a bat, capture/kill or injure a bat or disturb a breeding or resting site.

The applicant's ecologist states that the site provides negligible bat roosting habitat and low-quality foraging and commuting habitat, with the principal mitigation consisting of protecting retained boundary vegetation and woodland edge habitats,

retaining habitat connectivity and implementing a sensitive lighting design. Whilst these measures are welcomed and should be secured through planning conditions, the ecological assessment provides little justification for the conclusion that bat interest is low.

This is particularly relevant given that surveys undertaken on adjoining land recorded up to seven bat species foraging and commuting within the local landscape, whilst nearby woodland and tree lines were identified as having suitable roosting potential. The application site forms part of the same wider habitat network and is connected to surrounding woodland through retained boundary vegetation.

Furthermore, no clear justification is provided for classifying the site as having low bat foraging and commuting value. The Bat Conservation Trust's *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th Edition) recommends that a minimum of one activity survey is undertaken where habitats are assessed as having low suitability for foraging or commuting unless otherwise justified. No such survey appears to have been completed and no justification has been provided for departing from this guidance. Additionally, the two rural trees to be removed have not been assessed with a ground level tree assessment, in line with standard guidance. In the absence of robust evidence or justification for deviation, it is unclear whether the proposed mitigation is proportionate to the site's ecological value for bats. Consequently, the Local Planning Authority cannot be satisfied that the impacts on European Protected Species have been adequately assessed, as required by Policy CP7 of the Wokingham Core Strategy and the Conservation of Habitats and Species Regulations 2017.

In terms of lighting, it has been recognised in recent appeals that lighting cannot be controlled in private curtilages. The current layout design does provide a retained hedgerow to surround and separate the site, which is welcomed. It would be useful to indicate the size of the hedgerow and buffer habitat to indicate if lighting in residential curtilages will impact the woodland edge.

Following recommendations

- Provide justification for deviation from best practice guidance
- Provide a ground level tree assessment of the proposed two trees to be removed
- Provide buffer zone width to indicate the potential of lighting on boundary habitat.

Reptiles and Amphibians

I do not agree with the applicant ecologist's categorisation of the site as having low potential for reptiles. Whilst the site may have experienced historic disturbance, this alone is not sufficient justification for concluding that reptile interest is low. A review of aerial imagery between 2019 and 2025 indicates the site has remained largely undisturbed and contained a mosaic of habitat features including what looks like tussock-forming grassland, dense bramble scrub, ruderal vegetation, earth mounds, stone and sand piles, and open grassland areas. Although the site appears well managed in terms of the grassland sward currently, the site has the potential to be recolonised between the absence of management.

The features provide opportunities for basking, sheltering, foraging and dispersal and are directly connected to adjacent woodland and nearby water sources with no obvious dispersal barriers. Furthermore, ecological surveys undertaken on adjoining

land identified suitable habitat for reptiles such as slow worms and grass snakes, with a grass snake recorded 450m from the adjacent site boundary.

Slow-worms and grass snakes are protected under the Wildlife and Countryside Act 1981 and are listed as Species of Principal Importance under the Natural Environment and Rural Communities (NERC) Act. Under Wokingham Core Strategy Policy CP7, their presence requires development to avoid harm and provide mitigation to conserve and enhance biodiversity.

I acknowledge that presence/absence reptile surveys may be disproportionate given the relatively small size of the development parcel. The applicant ecologist proposes a staged and directional clearance of vegetation from open habitat towards retained cover to allow any reptiles present to disperse naturally into adjacent habitat. Whilst this is standard mitigation, I do not consider this measure alone to be proportionate to the suitability of the site for reptiles or the potential risk associated with habitat clearance.

The applicant ecologist suggests that development is limited and habitats are to be retained to justify minimal mitigation measures. I also disagree with the claim that habitat loss will be limited. The construction of five day-rooms will require ground preparation, topsoil removal and the installation of hardstanding and pathways. In addition, the caravan pitches will form private curtilage and it cannot be assumed that these areas will retain their current habitat value in the long term. As a result, there is likely to be a more substantial loss of habitat suitable for reptiles and amphibians than suggested within the application.

As such, precautionary mitigation should therefore be incorporated. As well as two-stage vegetation clearance, it should be undertaken during the reptile active season (April to September inclusive). Any topsoil removal will require an ecological clerk of works. Should a reptile be encountered during clearance works, works in that area should cease immediately and the animal should be carefully moved by a suitably qualified ecologist to adjacent retained habitat, with further works only proceeding once appropriate ecological advice has been provided. Such measures would provide a more robust and proportionate approach to avoiding harm to reptiles while recognising that formal survey work may not be justified in this instance. This precautionary mitigation measure is recommended to be secured via a Construction Environmental Management Plan (CEMP) condition.

Mammals – badger and hedgehog

In relation to badgers, the ecologist notes that an updated survey may be required should works be delayed; however, no timescale is provided to define when a survey update would be necessary. Furthermore, whilst the report relies upon precautionary working methods and habitat retention, no badger-specific or hedgehog specific construction safeguards have been identified. Given that development will involve groundworks associated with the day room, caravan pitches and associated infrastructure, consideration should be given to standard good practice measures such as covering excavations overnight, providing escape ramps where necessary and ensuring site personnel are aware of procedures should protected species be encountered. A CEMP condition will be required that ensure mitigation measures are implemented for the species.

Nesting birds

Although the applicant ecologist concludes that the site provides only "low-quality" nesting bird habitat with no justification to support this assessment. The ecologist

acknowledges that habitat loss has the potential to impact nesting birds and recommends mitigation measures accordingly. I agree that, should vegetation clearance be undertaken during the bird nesting season (typically March to August inclusive), a pre-construction nesting bird check should be carried out by a suitably qualified ecologist. To ensure these measures are implemented, I recommend that they are secured through a CEMP condition.

Biodiversity enhancements

Chapter 15 of the National Planning Policy Framework (NPPF) and Policy TB23 of the Wokingham Borough Development Plan require development proposals to deliver measurable biodiversity benefits through building layout, design, or landscaping. No biodiversity enhancements or compensation has been suggested such as bat and bird boxes or hibernacula. In the absence of enhancements recommended, the development does not comply with national and local legislation.

- Revise the PEA to provide recommendations for enhancement and compensation for habitat loss such as scrub habitat for nesting birds.

Thames Basin Heath, Special Protection Area (SPA).

This proposed 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 five 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 to purchasing capacity of an 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 contributions will be secured through a Section 106 Agreement.

Conditions & Reasons (if required)

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.

More conditions will be required based on further information requested.

Date:	01/07/26	Signed:	L.APARO
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