

MEMORANDUM

From:	Duncan Fisher Ecology Officer		
Service	SDL Ecology	App No:	242252
Address:	Moat House, Biggs Lane, Arborfield, Wokingham, RG2 9LN.		
Proposal:	Full Planning Permission for the change of use of the Moat House building from office (Use Class E) to residential (Use Class C3) to provide 4no. residential dwellings and associated internal roads, parking, landscaping, drainage, plant, bin, and cycle storage.		
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

Biodiversity Net Gain

This application will be subject to mandatory biodiversity net gain, should permission be granted.

A Biodiversity Net Gain Assessment report (Aecom, ref: 60728610 revision 3, November 2024) has been submitted along with a Statutory Metric (no Start Tab info completed – referred to as iteration 2 for tracking purposes here). Comments directly relevant to the metric have been supplied separately in a copy of this metric, within tabs A-1 and B-1.

It is good to see that the veteran tree has now been recognised within the metric in the baseline. Unfortunately, it has not been given the right size category (according to the metric user guide it should be considered very large). This needs to be corrected.

More pressingly for resolution of the baseline units figure, the applicant needs to clarify why the metric has a different condition score for the 'other neutral grassland' on site when compared to the report, appendix D condition score sheet. I recommend that the metric be submitted with a condition score that matches that assessed in the report.

Whilst it is not a requirement to agree a detailed biodiversity net gain plan prior to determination, it is relevant to know the broad strategy for biodiversity net gain at this stage. If the strategy relies on significant delivery on-site, the local planning authority should consider the means by which that delivery is secured.

The strategy does appear to be reliant on delivery on-site – through creation of medium distinctiveness habitats according to the metric. Considering the revised landscaping proposals, I am of the view that this strategy is deliverable. I understand that these habitats will be maintained by a management company.

It will be relevant for the local planning authority to secure management for a minimum period of thirty years via a Landscape Environmental Management Plan condition and the monitoring of delivery via a planning obligation on the identified land.

Veteran Tree

I am of the view that the revised landscape plans provide design that will allow retention of an adequate buffer for the veteran tree, provided ongoing management is secured via a LEMP.

Badger

I can recommend that the revised landscaping proposals will likely enable the retention of a functional Badger sett feature and the local planning authority can be confident that the proposals will not harm this species should CEMP and LEMP conditions secure appropriate mitigation during construction and in the operational phase.

Bats

I repeat my comments regarding bats (to help explain the recommended condition wording below).

Previous surveys have confirmed the Moat House as being used by bats for roosting. The applicant's ecologists consider these roosts to most likely be low status roosts of more common species of bat. More recent surveys have not been undertaken to reconfirm the status of the bat roosts present. However, I think it reasonable to work on the bats roosts are likely still present and of a similar status.

Given that the proposal is to refit a building already in use without a need to modify the locations where bat emergence has been observed, I am not convinced that a licence will be needed from Natural England. It may well be that the development can be carried out using non-licensable mitigation measures. I therefore do not recommend applying a condition for a copy of a derogation licence to be submitted prior to works. However, it is relevant for the developer to include detailed bat mitigation measures to be followed during construction within the conditioned CEMP. If the situation changes and there is a definite need for a derogation licence from Natural England, this too can be picked up within the CEMP.

The submitted Ecological Constraints Report also identifies that the site is within a secondary dark corridor, according to the conditioned overarching bat mitigation strategy for application O/2014/2280. It goes on to recommend implementing the same mitigation and enhancement measures set out in relation to that mitigation strategy. I'm minded to agree that favourable conservation status of protected species could be maintained through retention of the existing bat roosts in the building and application of the measures outlined within the bat mitigation strategy referenced. It would be useful if this bat mitigation strategy could be formally submitted for this planning application. A condition could then be applied to bring this development into line with the overarching bat mitigation strategy (rather than rely on a condition wording that risks detailed submission of items contradicting it). I have suggested a condition wording in relation to bats on the basis that the overarching bat mitigation strategy can be submitted for this application.

Conditions & Reasons (if required)

Construction Environmental Management Plan (CEMP)

As per the BS42020:2013 standard condition D.4.1. or with the protected species items amalgamated with any other CEMP condition wording recommended by other specialists.

Landscape Environmental Management Plan (LEMP)

As per the BS42020:2013 standard condition D.4.5. but also to have delivery of biodiversity net gain specified as an objective.

Bats

Condition: *Prior to commencement a detailed bat mitigation strategy for the site, in line with the submitted overarching Arborfield Garrison – Bat Mitigation Strategy (AECOM Environment, Sept 2014), with measures to maintain the dark corridors and provide enhanced roost availability, shall be submitted for approval. The approved mitigation, contingency and enhancement measures shall thereafter be implemented in full.*

Reason: *To maintain the favourable conservation status of a protected species as per the ODPM circular and local plan policies CP7 and TB23.*

Date:	20 January 2024	Signed:	D. Fisher
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