

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	260362
Address:	Sequoia Field and Barn End, Wellingtonia Avenue, RG45 6AD.		
Proposal:	Application for permission in principle for the erection of up to 9 No. dwellings.		
Type of Development:	Minor Dwellings (1-9) PiP		
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

This site is located within the 5km Impact Risk Zone of the Thames Basin Heaths Special Protection Area, which is a protected European wildlife site. Due to this type of application, a planning obligation cannot be applied, thus the proposal does not include any measures to avoid or reduce harm to this protected area, it is therefore classed as habitats development.

Without proper mitigation, the council cannot be confident that the development would avoid damaging the Thames Basin Heaths SPA. This is required under Regulation 63 of the Habitats Regulations and Article 6(3) of the Habitats Directive. As a result, the proposal conflicts with Policy NRM6 of the South east Plan and Policies CP8 and CP4 of the Core Strategy.

Preliminary Ecological Appraisal (PEA) and Preliminary Roost Assessment (PRA):

The PEA is required to evaluate baseline habitat conditions and their potential to support European Protected Species and Priority Species. This is necessary to ensure compliance with relevant legislation, including the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017.

The application site lies within an area identified by the Council's bat roost suitability dataset as having potential to support roosting bats. As such, a Preliminary Roost Assessment will be required to assess trees that are to be removed or may be

impacted by the proposed development. It should also assess the site's value for commuting and foraging bats. Bats are a European Protected Species and are therefore a material consideration in the planning process.

Biodiversity Net Gain (BNG) Assessment

This should include the submission of the statutory biodiversity metric, clearly setting out both baseline and proposed habitat values. These should be supported by appropriate justification, including condition assessment sheets derived from a UK Habitat Classification survey. This information will demonstrate how the development can meet the mandatory requirement to deliver at least a 10% Biodiversity Net Gain.

While a detailed Biodiversity Gain Plan is typically secured by a pre-commencement condition, sufficient information must be provided at application stage to demonstrate that the proposal is capable of achieving and securing the required net gain in accordance with relevant national policy and legislation.

Conditions & Reasons (if required)

N/A

Date:	10/04/26	Signed:	L.Aparo
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