

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251458
Address:	Jardine Meadows, Croft Road, Shinfield, RG7 1YP.		
Proposal:	Full application for the proposed erection of 2no. detached 4-bedroom dwellings, access and associated landscaping.		
Type of Development:	Minor Dwellings (1-9)		
Site Visit Made:	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

I have read the Ecological Appraisal Update and BNG Report (Calyx Environmental, Ref CDL25001, May 2025), Planning Statement and Arboricultural Implications Report. I have also review the Statutory Metric CDL25001 V2 and the plans and drawings submitted in support of the application in addition to reviewing the site planning history and previous ecological and arboricultural assessments, photos, and mapping.

Ecological Appraisal Update

Habitats

The Ecologist has failed to take account of the assessments and photos in the Preliminary Ecological Appraisal (The Ecology Group, Ref 2728) Arboricultural Assessment & Method Statement, Tree Protection Plan, Planning Design and Access Statement and Site Plan submitted in support of application 181834 and discharge of conditions 192124. The baseline assessment undertaken by Calyx Environmental has not adequately taken account of the comments made by WBC Ecology on application 233039 and I am not satisfied that the baseline is accurate and has been assess in line with the User Guide and regulations.

The EcIA update Sections 6 and 7 acknowledge that the site had recently been cleared in 2023 and is now closely mown grassland. I agree that the east of the site is not Ancient Semi Natural Woodland and can be classified as w1g Other Broadleaved Woodland. However, I don't agree that the woodland should be considered as single parcel and suggest that the habitat on west of the path is

assessed separately. Only the Arboricultural implications report by SJA Trees Arboricultural Implications Report has been used by the Ecologist to assess the baseline condition and Arboricultural Assessment & Method Statement (Barrell Ref 18093-AA-CA, 18 June 2018) and Tree Protection Plan (Barrell Ref 18093-BT2) have not been used to evaluate the baseline.

According to AIA & AMS 18093-AA-CA no trees were to be removed as a result of the 181834 permission. Low arboricultural quality trees T13 and groups G21 (Ash) and G25 (Cypress) were assessed as needing removal for management reasons. The Ecology Partnership advised that *"trees which are felled should be replanted with native species in a ratio of 3:1"*. They recommended that Cherry laurel and Portuguese laurel should be removed and replanted with native species.

The tree survey compensation planting and habitat management proposed should have been in the current baseline assessment. The tree protection scheme (Barrell Plan Ref 18093-BT2 and construction method statement secured have been breached, and materials were stored in the Construction Exclusion Zone of the TPO woodland. This evidence of degradation of grassland and habitat since January 2020 has not been assessed. Planting of the native hedgerow, Field maple and the grassland creation in Plot approved under 181834 Conditions 10, 11 and 12 and other compensation planting have not been implemented as approved, degradation caused by AMS and Construction Management Plan breaches, and failure to compensation and implement landscape management proposals should have been taken into account by Calyx Environmental.

Based on the information provided in the Ecological Appraisal Update and the Ecologist's failure to consider previous surveys I must disagree with Ecological Appraisal Update paragraph 7.5 that the condition of the onsite habitat should be classified as poor. The Ecologist states *"Under BNG rules for assessing the prior condition of lost or degraded habitats, the pre-development biodiversity value must be taken to be the highest biodiversity value of the habitat which is reasonably supported by any available evidence relating to it"*.

In line with Metric User Guide a precautionary approach should have been taken Calyx Environmental and in the absence of contrary evidence a higher condition score must be assigned to the woodland and grassland. While the Berkshire Local Nature Recovery Strategy for Berkshire will not be adopted until October 2025, I must disagree that there is no guidance on strategic significance. WBC SPD, design guide, local and national Biodiversity Action Plans, as well as the Tree Preservation Order TPO-1968-2024 should have been taken into account, and the woodland assessed as either 'ecologically desirable' or 'Formally identified in local strategy'. The woodland habitat should therefore be assessed of High strategic significance in the BNG metric.

Lowland mixed deciduous woodland which is a habitat of principal importance and is contrary to local plan policies CP3, CP7 and TB23. The location of this woodland block is particularly important as it forms part of the remaining wildlife corridors for the wider Strategic Development Location. As such, it would also be contrary to local plan policies CP3 and TB23. The proposal does not set out a reasonable justification for the woodland loss, nor does it propose adequate mitigation and compensation

and enhancement.

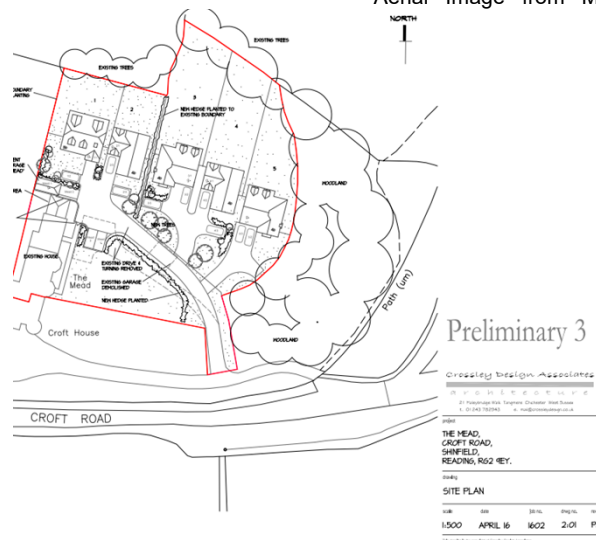
For the above reasons I do not agree with the condition assessment and baseline habitat value assessed. I recommend that the current metric is not agreed. I consider that loss of biodiversity habitat has been under recorded and the hierarchy has not been applied, therefore approval of the application would not be in accordance with the NPPF and local plan policy.



Aerial Image from 2019



Aerial Image from May 2020



Protected / Notable Species

I must disagree matters relating to pre-clearance risk assessment, avoidance or mitigation measures in respect of protected species should be outside of the scope of the current ecological appraisal.

Ecological Appraisal Update paragraph 6.8 states *“the main proposed development area is currently unsuitable for reptiles due lack of suitable cover within the area of mown grassland”*. The Ecologist states *“Based on assessment of likely habitat prior to clearance, which appears to be recent secondary woodland similar to the remaining belt, it is likely that much of the site would have been too shaded. Although presence of widespread species (e.g. slow-worm) around margins cannot be ruled out”*.

The cumulative impact on wildlife including birds, amphibians and particularly reptiles and bats have not been assessed or mitigation proposed. The Preliminary Ecological Appraisal recommended that the compost heap is hand-searched by an ecologist and advised *“It is also important that the site's grassland is maintained to a height of*

below 5cm to prevent suitable reptile habitat becoming established prior to development". According to the photos provided in 2023 and 2025 by Calyx Environmental, it appears that the retained grassland has been deliberately degraded to reduced and prevent maintenance of reptile and amphibian populations.

I disagree that that wildlife including notable and protected species previously likely to have been supported by the site which will be indirectly or directly affected by the proposals will not be impacted. While off site mitigation is recommended, contrary to Local Plan and NPPF policy, no on-site mitigation and limited enhancements for protected species are proposed. The Ecological Assessment Updates fails to propose planning obligations for adequate blueline land compensation to secure maintenance and enhancement of wildlife populations, or to off-set for the removal of trees, damage to woodland and lack of appropriate management required by planning policy.

Planning Policy

According to WBC Local Plan Policy CP3 planning permission will be granted for proposals that:

c) Have no detrimental impact upon important ecological, heritage landscape (including river valley) or geological features or water courses.

d) maintain or enhance the ability of the site to support fauna and flora including protected species:

Development proposals will be required to demonstrate how they have responded to the above criteria through the submission of Design and Access Statements, clear and informative plans, elevations and streetscenes and where required Masterplans, Development Briefs, Concept Statements and Design Codes.

CP7 states that development which may harm habitats of principle importance for nature conservation, or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly; will be only permitted if it has been clearly demonstrated that no alternative site that would result in less or no harm is available which will meet the need. And 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.

According to MDD TB23, planning permission for development proposals will only be granted where they comply with policy CP7 and also demonstrate how they provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing.

Planning Statement

The very low biodiversity value described in paragraph 2.33 that results from degradation of the site since 30 January 2020 will not be adequately compensated or mitigated by the Ecologist's recommendations. I note that incorporation of bird nest and bat roost features within the new dwellings previously recommended by The Ecology Group was not secured in the ecological enhancements proposed in 192124. In addition, it is unlikely that the LPA could secure long-term retention of native hedges and fruit trees in private gardens. The recommendations made are not in accordance with policy, and therefore not sufficient or to mitigate negative impacts and compensate for the cumulative loss of notable species and biodiversity habitat.

The current application does not propose retention, compensation or enhancement or address the degradation of the site raised in WBC Ecology's response to application 233039. I do agree that the previous ecological objections and failure to comply with the NPPF and local plan policy have been addressed.

Summary

The application has not assessed the in-combination effects of, and failure to implement as proposed the previous permission, the direct and indirect impacts on wildlife previously likely to be supported by the site and adjacent habitats which would be affected. The detrimental impacts on wildlife and loss of biodiversity habitat have not been adequately assessed nor justified in accordance with policy. I therefore object to the development proposals on the grounds that it is contrary to local plan policies including CP3, CP7 and MDD TB23 and the NPPF Section 15.

Conditions & Reasons (if required)

Date:	1/9/25	Signed:	T Cuss
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