
MEMORANDUM

From:	Tina Cuss		
Service	WBC Ecology	App No:	241828
Address:	58 Finchampstead Road, Wokingham, Wokingham, RG40 2NS.		
Proposal:	Full application for proposed erection of 4no detached dwelling houses following demolition of the existing dwelling and associated outbuildings.		
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 Updated Preliminary Ecological Appraisal and Roost Assessment V3 (Arbtech, 3 July 2025), updated Biodiversity Net Gain Assessment (Arbtech, 3 July 2025) and Biodiversity Metric V2 (Arbtech, 3 July 2025). I have also reviewed the Tree Protection Plan (Arbtech, July 2025).

Arboricultural Impact Assessment

If the application is approved, I request that WBC model condition CL7 is included in the decision notice.

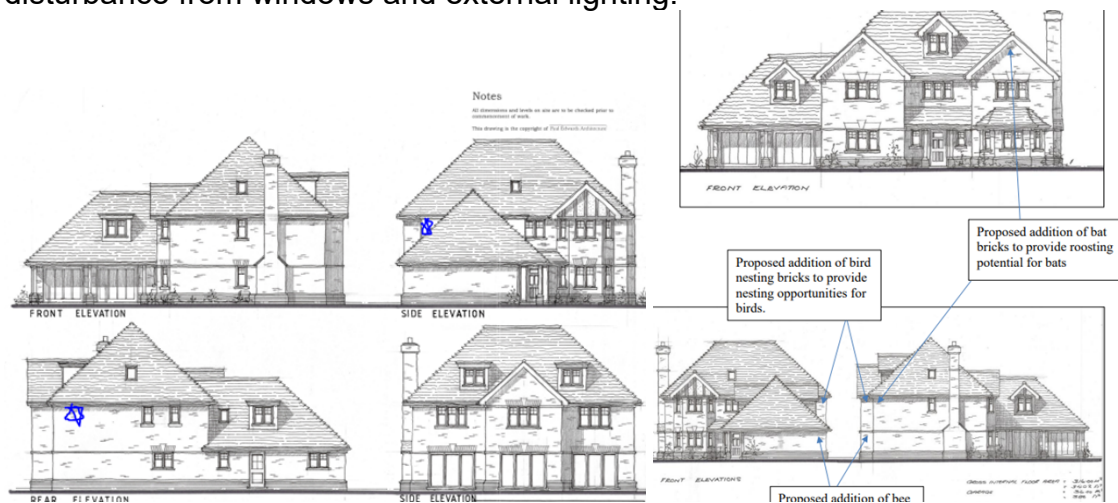
Bat Survey Report

I am satisfied the survey effort and methodology of the emergence activity surveys carried out on 8 May and 3 June 2025 is adequate. Soprano pipistrelle, Nathusius's pipistrelle, Serotine, Brown long eared bats were seen and recorded foraging and garden and commuting over and around, the house, lawn and trees. Common pipistrelle activity on 8 May is described at constant.

I agree with Plan Ecology's conclusions that no further bat surveys are necessary and that the result of a survey can never completely rule out the presence of bats at a building as use may be obscure or occasional. I request a CEMP biodiversity condition with details of the supervising ecologist and toolbox talks before clearance, construction or demolition works start on site.

I can't agree with Plan Ecology's statement that *"there will be no negative impact on bat commuting and foraging areas as the building will not increase significantly in footprint enough to have an effect"*. The cumulative effect of tree felling and shrub clearance undertaken before the application was submitted, proposed further clearance including the western hedge and the significant increase in predation and disturbance which are likely to result in the increase from one to four 4-bed dwellings have not been taken into consideration.

I note compensation planting and soft landscaping are not included in Appendix 4 Biodiversity Enhancements. To recommend approval of the compensation, enhancement proposals the integral bat bricks should be relocated away from single storey garages and positioned at least 4m above ground level away from disturbance from windows and external lighting.



The Planning Statement contradicts the Arboricultural Impact Assessment, PEA and Design and Access Statement. Contrary to planning policy, the Planning Statement and Site Plan don't demonstrate that the development will retain and enhance existing landscape buffers particularly to the western external boundary.

The Site Plan has no key. The applicant doesn't demonstrate that the DAS statement that *"all existing trees will be retained and further trees planted to enhance the setting of the site"* will be achieved. It has not been shown there is sufficient space for shrub and tree planting along the western boundary. Unless the garage and house in Plot 1 are set back further east I can't currently agree with Planning Statement paragraph 5.10 that the *"dwellings would be set generously in from the external boundaries of the site allowing for the mature trees and other planting to be retained"*. I note the Landscape Officer's comments. Planning policy doesn't support the removal of hedgerow to install a close board fence unless replace by a comparable wildlife corridor. Pruning and removal of shrubs and trees on the western boundary must be minimized and mitigated, by retention or recreation of a wildlife corridor to provide ecologically permeable and maintain foraging and commuting routes.

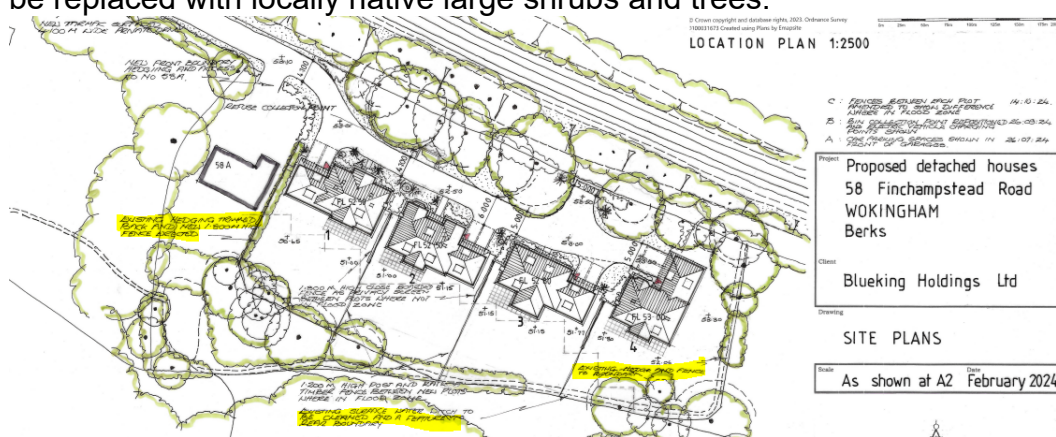
I support the DAS proposal a recognised landscape architect will design the landscape proposals. In line with policies CP3, CP7 and TB23, planning conditions must secure submission and approval of landscaping scheme to compensate on-site for the impact of habitat loss on wildlife, protect and enhances vegetated

boundaries and wildlife wild corridors, a long-term Landscape and Ecological Management Plan and scheme of ecological enhancements.

Preliminary Ecological Appraisal and Roost Assessment V3

I support the conclusions of Arbtech's Ecologist set out in the Executive Summary of the PEA. The impact on wildlife of proposed clearance / "cleaning" of the ditch during construction and occupation phase and the proposals to landscape "to form a feature and boundary to the site" must be addressed in a Construction Environmental Management Plan (CEMP Biodiversity) that must be submitted and approved prior to any site set-up, clearance or groundworks. To ensure that management of the ditch protects and mitigates for negative impact on wildlife maintenance and monitoring should be included in the LEMP which is secured by condition or S106 obligation.

I support the PRA proposal to remove or control Cherry laurel and Rhododendron on the site. Where these invasive species are removed from the boundary they must be replaced with locally native large shrubs and trees.



According to the PEA the applicant proposes that low-impact lighting strategy will be adopted for the site in order to maintain dark corridors in line with ILP/BCT [Bats and Artificial Lighting in the UK' Guidance Note GN 08 / 23](#). The external lighting strategy and the protected species enhancements suggested by Arbtech must be secured by condition to comply with the NPPF and policies CP3 and CP7.

Reptiles

The multiple woodchip, spoil and log piles and scrub provide foraging and suitable refuges for common reptiles. The site has good connectivity to further suitable reptile habitat in the wider landscape. Clearance of further scrub and trees and management of grassland must not be undertaken until reptile mitigation method statement has been submitted to and approved by the LPA. In order to implement the development and the landscaping enhancements, the reptile strategy also must consider the need to translocate reptiles off-site; and take account of predation by pets as well as the cumulative impact other local planning permissions. I request that the log piles shown in the Survey Map in Appendix 1a of V2 of the PEA are readded to the CEMP Biodiversity Plans and PEA V3 to ensure the Contractor and the Owner are aware dismantling of piles must be undertaken with ecological supervision in accordance with the method statement to be approved by the Council.

No areas of native shrub planting are included in the Site Plan as recommended by the Ecologist. These must be included in the landscaping proposals to ensure wildlife is maintained and enhanced in line with local plan policy.

Amphibians

The pond map in appendix 1C and 1a fail to include the blue line land pond shown on the Location Plan immediately outside the southwest corner of the site. The pond has been damaged by tree felling and degraded by the landowner. Refugia searches have not been completed to rule out the presence and impact to amphibians.

According to WBC information and OS maps the pond is likely to be fed by the southern ditch. Lanmor Consulting's letter ref 241778/KL/ml/01 states that freeholders have the responsibility to "*let water flow naturally with undiminished quantity and quality, not to obstruct the flow of a watercourse to the detriment of your neighbours*". The landscaping and drainage schemes, the LEMP and CEMP Biodiversity should therefore address the need to protect the pond and habitat for amphibians and provide enhancement in line with CP3, CP and MDD TB23.

BNG ASSESSMENT

I am satisfied that the revised BNG Assessment confirms that the site was degraded and neutral grassland, scrub and medium and large mature trees including one veteran tree were removed prior to submission of the application.

I agree that the on-site baseline habitat unit value set out in Statutory Metric V2 and BNG Assessment is 7.83 including 6.60 units of Individual Trees. The baseline value of watercourse units is 0.42, with no net change predicted.

Biodiversity net gains can't be legally secured in private gardens so the Ecologist can only record vegetated garden in the metric. The Post Development Habitat Plan in Appendix 4 therefore doesn't include on-site shrub, hedgerow or tree planting what will need to be secured by a landscaping condition or habitat enhancement.

Summary

Provided all the conditions below secure protection during clearance and construction, maintenance in the occupation phase and adequate compensation on site to maintain and enhance retained and new planting and corridors for wildlife, there are no outstanding ecological objections.

Conditions & Reasons (if required)

As of 2nd April 2024, a 10% Biodiversity net gain (BNG) for minor developments is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Under the statutory framework for biodiversity net gain, this planning permission is deemed to have been granted subject to the condition that the biodiversity gain objective is met (the biodiversity gain condition). The biodiversity gain condition is a pre-commencement condition: Once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development.

Development may not be begun unless a Biodiversity Gain Plan has been submitted to the planning authority and the planning authority has approved the plan.

The biodiversity gain plan must include:

- a. information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;
- b. the pre-development biodiversity value of the onsite habitat;
- c. the post-development biodiversity value of the onsite habitat;
- d. any registered offsite biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development;
- e. any biodiversity credits purchased for the development; and
- f. any such other matters as the Secretary of State may by regulations specify.

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. Toolbox talks and details of 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).
- 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 the prior approval in writing of the local planning authority has first been sought and obtained.

Reason: To ensure that protected and priority species are maintained and features for wildlife are enhanced. Relevant policy: The NPPF Section 15, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Prior to the commencement of the development a lighting design strategy for light-sensitive biodiversity, designed in accordance with Institution of Lighting Professionals ‘Guidance Note 08/18 Bats and Artificial Lighting in the UK’ shall be submitted to and approved in writing by the local planning authority. The scheme shall with details of location, height, type and direction of light sources and intensity of illumination and through the provision of appropriate colour contour plans and technical specifications clearly demonstrate that any areas to be lit will not disturb or negatively impact biodiversity. All external lighting shall be installed and maintained in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

Reason: To protect biodiversity. Relevant policy: NPPF Paragraph 198 Section 15 (Conserving and Enhancing the Natural Environment), Local Plan policies CP1, CP3 CP7 and TB23

Condition: Prior to commencement of development details of a scheme of biodiversity enhancements shall be based on recommendations given in Preliminary Ecological Appraisal and Roost Assessment V3 (Arbtech, 3 July 2025) and in the Bat Survey Report (Plan Ecology, 9 June 2025). The details of the scheme shall include:

- a) A timetable for its implementation,
- b) Detailed proposal for integrated Habitat bat boxes to be installed as high as possible just under the eaves on the exterior walls on buildings on the site.
- c) Proposals for integration of bird boxes such as Schwegler Swifts boxes and House sparrow terraces into buildings on the site.
- d) Schwegler nest boxes and robin boxes to be installed on retained mature trees.
- e) Detailed proposals for log piles enhancements for invertebrates, amphibians and reptiles.

The biodiversity enhancements shall thereafter be completed and maintained according to the detail and the timetable as approved.

Reason: To ensure that protected and priority species are maintained and features for wildlife are enhanced. Relevant policy: The NPPF Section 15, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Prior to the commencement of the development a lighting design strategy for light-sensitive biodiversity, designed in accordance with Institution of Lighting Professionals 'Guidance Note 08/18 Bats and Artificial Lighting in the UK' shall be submitted to and approved in writing by the local planning authority. The scheme shall with details of location, height, type and direction of light sources and intensity of illumination and through the provision of appropriate colour contour plans and technical specifications clearly demonstrate that any areas to be lit will not disturb or negatively impact biodiversity. All external lighting shall be installed and maintained in accordance with the scheme. Under no circumstances should any other external lighting be installed without prior consent from the Local Planning Authority.

Reason: To protect biodiversity. Relevant policy: NPPF Section 15 (Conserving and Enhancing the Natural Environment), Local Plan policies CP1, CP3 CP7 and TB23.

Condition: Prior to the commencement of the development, full details of both hard and soft landscape proposals shall be submitted to and approved in writing by the local planning authority. These details shall include as appropriate, proposed boundary treatments with hedgehog gaps, car parking layouts, and pedestrian access and circulation areas, hard surfacing materials and minor structure (e.g. refuse or other storage). Soft landscaping details shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate, and implementation timetable.

All hard and soft landscape works shall be carried out in accordance with the approved details in accordance with a timetable approved in writing by the local planning authority. Any trees or plants which, within a period of thirty years after planting, are removed, die or become seriously damaged or defective, shall be replaced in the next planting season with others of species, size and number as originally approved and permanently retained.

Reason: To ensure that there is no net loss of biodiversity habitat and protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF Section 15, Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: A Landscape and Ecological Management Plan (LEMP) shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the development [or specified phase of development]. The content of the LEMP shall include the following.

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organization responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanisms by which the long-term implementation of the plan will be secured by the developer with the company responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To ensure that there is no net loss of biodiversity habitat and protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF Section 15, Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition:

- a) No development or other operation shall commence on site until an Arboricultural Method Statement and Scheme of Works which provides for the retention and protection of trees, shrubs and hedges growing on or adjacent to the site in accordance with BS5837: 2012 has been submitted to and approved in writing by the local planning authority. No development or other operations shall take place except in complete accordance with the details as so-approved (hereinafter referred to as the Approved Scheme).
- b) No operations shall commence on site in connection with development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening or any other operation involving use of motorised vehicles or construction machinery) until the tree protection works required by the Approved Scheme are in place on site.
- c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within an area designated as being fenced off or otherwise protected in the Approved Scheme.
- d) The fencing or other works which are part of the Approved Scheme shall not

be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery and surplus materials removed from the site, unless the prior approval in writing of the local planning authority has first been sought and obtained.

Reason: To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of wildlife and amenity value to the area. Relevant policy: Local Plan Core Strategy policies CP1, CP3, CP7 and Managing Development Delivery policy TB23.

Date:	30/07/25	Signed:	T Cuss
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