
MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	SDL Ecology	App No:	260527
Address:	Lm Park, Toutley Road, Wokingham, RG41 1DB.		
Proposal:	Full application for a new detached office building with associated external works.		
Type of Development:	Minor All other developments		
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 submitted and reviewed in support of this application:

- River Condition Assessment & Biodiversity Net Gain Assessment, February 2026, Revision A by John Wenmen Ecological Consultancy LLP
- The Statutory Biodiversity Metric Tool dated 13th February 2026, Revision 1 by Lauren Hayward and Vicky Potts on behalf of John Wenmen Ecological Consultancy LLP.
- Preliminary Ecological Appraisal, February 2026, Revision A by John Wenmen Ecological Consultancy LLP

Biodiversity Net Gain

The applicant has submitted a Biodiversity Net Gain (BNG) Assessment and River Condition Assessment, paired with a Statutory Metric Tool. I agree with the categorisation of baseline habitats and their condition.

The submitted BNG metric demonstrates that the proposal does not achieve the statutory requirement of a minimum 10% net gain in habitat, hedgerow and watercourse units, as required under the Environment Act 2021. The applicant has indicated that this shortfall will be addressed through the purchase of off-site biodiversity units.

The use of off-site units is acceptable in principle, subject to compliance with Environment Act 2021, which stipulates any off-site units must be secured via the statutory Biodiversity Gain Site Register. As such, prior to commencement, the

applicant must submit a biodiversity gain plan and provide a biodiversity Gain Site Register number to discharge the condition.

Protected Species

Bats

The applicant's ecologist identifies the bramble scrub adjacent to the watercourse as the most ecologically important feature on site. As this habitat will be retained, and the surrounding landscape provides more optimal foraging and commuting opportunities, it is reasonable to conclude that the proposed development will have minimal direct impacts on foraging and commuting bats.

The ecologist has appropriately recognised that artificial lighting has the potential to result in indirect impacts on bats. A sensitive lighting strategy is therefore recommended to minimise light spill onto key habitats and commuting routes. Given that the site falls within suitable habitat according to the Council's internal Bat Habitat Suitability Model, I agree that a sensitive lighting plan should be secured by condition.

Amphibians

While the site itself does not provide optimal habitat for amphibians, the presence of nearby waterbodies and a stream adjacent to the site boundary indicates potential for amphibian use, particularly for commuting and foraging. The ecologist recommends precautionary mitigation measures, including the removal of debris by hand, pre-commencement hand searches, undertaking vegetation clearance during the active season, and maintaining vegetation as a short sward. These measures are proportionate to the level of risk identified. I agree with this approach and recommend that they are secured through a Biodiversity Method Statement condition.

Other Species

Potential impacts to other protected and priority species can be appropriately managed through standard best practice measures. These include covering excavations overnight and avoiding vegetation clearance during the bird nesting season. Such measures are considered sufficient and should be secured within the Biodiversity Method Statement.

Protected Habitats

The proposed development lies within the riparian zone of a stream located immediately adjacent to the northern boundary. This watercourse is understood to be a tributary of Elm Brook. While the tributary itself is not automatically classified as a priority habitat, it forms part of a wider river system which is listed as a priority habitat under the UK framework.

There is potential for the stream to be degraded during construction if appropriate safeguards are not implemented. The applicant's ecologist has proposed precautionary measures, including the establishment of buffer zones, the use of protective ground coverings, and the provision of spill kits and other pollution prevention controls. I agree these measures are required and therefore recommend that they are secured through a Biodiversity Method Statement condition to ensure

that the development does not adversely affect the adjacent watercourse or its hydrological connection to Elm Brook.

Biodiversity Enhancements

To comply with Wokingham Borough Local Plan Policy TB23 and the National Planning Policy Framework 2024 (Chapter 15), all development proposals should incorporate opportunities to deliver measurable biodiversity enhancements through layout and design.

In this case, the Preliminary Ecological Appraisal (PEA) recommends the inclusion of features such as insect hotels, integrated bat and bird boxes within the new dwelling, and hedgehog access gaps within any close-boarded fencing. These measures are proportionate and appropriate to the scale and location of the development and would contribute to delivering policy-compliant biodiversity enhancements.

I therefore agree with the ecologist's recommendations and advise that these measures are secured by condition to ensure they are implemented as part of the development.

Conditions & Reasons (if required)

Biodiversity method statement condition

No development shall take place (including any demolition, ground works, site clearance) until a method statement for habitat protection, amphibians, breeding birds and mammals has been submitted to and approved in writing by the local planning authority. The content of the method statement shall include the:

- a) purpose and objectives for the proposed works;
- b) detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
- c) extent and location of proposed works shown on appropriate scale maps and plans;
- d) timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- e) persons responsible for implementing the works;
- f) initial aftercare and long-term maintenance (where relevant);
- g) disposal of any wastes arising from works.

The works shall be carried out strictly in accordance with the approved details and shall be retained in that manner thereafter.

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 198 Section 15 Core Strategy policies CP7 and Managing Development Delivery Local Plan policy TB23.

Lighting design strategy for light-sensitive biodiversity – Condition

Prior to occupation, a "lighting design strategy for biodiversity" for buildings, features or areas to be lit shall be submitted to and approved in writing by the

local planning authority. The strategy shall:

- a. identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b. show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority

Reason: To policy compliance with national legislation Wildlife and Countryside Act 1981, Conservation of Habitats and Species Regulations 2017 and Wokingham Core Strategy, Policy CP7.

Species Compensation and Enhancement Condition

Condition: Prior to construction, a scheme for ecological permeability and biodiversity compensation and enhancement, such as the incorporation of two permanent bat roosting feature(s) per dwelling and access points for hedgehog to gardens, shall be submitted to and agreed in writing with the Local Planning Authority. The approved details thereafter shall be implemented, retained and maintained for their designed purpose in accordance with the approved scheme. The scheme shall include, but not limited to, the following details:

- a) Description, design or specification of the type of feature(s) or measure(s) to be undertaken;
- b) Materials and construction to ensure long lifespan of the feature/measure
- c) A drawing(s) showing the location and where appropriate the elevation of the features or measures to be installed or undertaken.
- d) When the features or measures will be installed within the construction, occupation, or phase of the development.

Reason: To ensure the development is policy compliant with regards to Policy TB23: Biodiversity and Development of the Wokingham Borough Development Plan.

Date:	16.04.26	Signed:	L.Aparo
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