
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	252968
Address:	Moor Green Barn, Lower Sandhurst Road, Finchampstead, Wokingham, RG40 3TJ.		
Proposal:	Full application for the proposed change of use of land to residential curtilage along with change of use of the existing building to an independent dwelling with associated changes to fenestration		
Type of Development:	Other Change of Use		
Site Visit Made:	No		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☒ No objection subject to conditions (and reasons) **stated below**
- ☒ Negotiate the amendments **stated below**; or
- ☐ Request further information before determination as **stated below**
- ☐ Objection due to the reason(s) **stated below**

Comments On Proposal

I have reviewed the Precautionary Working Method Statement (Ecological Ltd), Bat Roost Assessment V1 (Ecological, August 2025), Planning Statement (Davies Planning). I have also reviewed the plans and elevations submitted in support of the application. is provided

Thames Basin Heaths SPA

The application would result in a net increase in dwellings within the Thames Basin Heaths 5km Linear Mitigation Zone. The application must be assessed for likely significant effects on the Thames Basin Heaths SPA via the recreational pathway. Unless appropriate avoidance and mitigation measures are secured the development is likely, either alone or in-combination with other plans or projects, to result in an adverse effect on the SPA. The Bat Roost Assessment and the Planning Statement do not consider the impact of the TBH Mitigation Zone or that the site is within the Blackwater Valley site allocation. To comply with planning policy and protect the integrity of the SPA, the applicant must enter into a S106 agreement to secure SPA and SAMM contribution prior to first occupation.

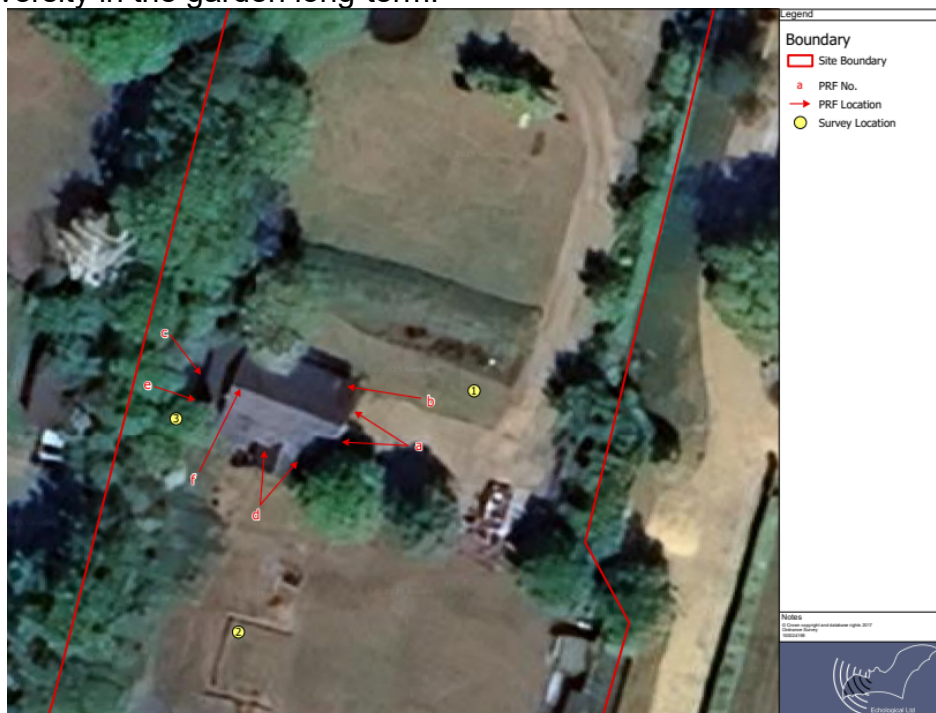
Biodiversity Net Gain

The site area according to the application for and Existing Site Plan (Dwg 1.MGB.0B)

is 0.26ha (2600m²). I do not therefore disagree with the applicant's justification why the development is exempt from the General Biodiversity Condition as the site area is not smaller than 25m².

I note the development is not a self-build and the dwelling is proposed as market housing. According to the Planning Statement 5.13 *"The proposed dwelling will offer a high standard of amenity internally in compliance with MDD Policy TB07 and will be provided with a private and secluded garden with depth well in excess of 11m"*. This statement therefore contradicts the application form which states that there are no trees or hedges on the development site and no trees or hedges on adjacent land which could influence the development. Contrary to national and local validation list requirements neither the Location Plan (Existing Site Plan Dwg 1.MGB.0B) and/or Existing Site Layout MGB.EP are contrary to local and national requirements as they fail to include any details of boundaries, hedges or trees and natural features.

The application form is inaccurate, and the Proposed Site Layout Plan MGB.SP fails to demonstrate that existing trees will be retained. I am concerned in the absence of any details of existing trees and hedgerows in the Site Area, that the change of use from commercial to residential fail to secure protection during construction or retention of boundary features, hedges, shrubs or trees or secure not net loss of biodiversity in the garden long-term.



To ensure that the development is exempt from the General Biodiversity Condition the current Existing Site (Location) Plan must not currently be approved. The Existing and Proposed Plans must be amended to show that retention of all trees, shrubs and modified grassland can be secured in the construction and occupation phases, and in the long term, and the de minimis area exemption would apply. I request that the proposed bike store is not approved and is relocated away from the southwest elevation to minimize loss of features for wildlife and disturbance including light pollution and retain quiet dark corridors. If the application is approved, planning conditions securing approval and implementation of an Arboricultural Method Statement and landscape retention must be imposed.

Protected Species

All bat species are protected under the Conservation of Habitats and Species Regulations 2017 and the Wildlife and Countryside Act 1981, as amended. Under this legislation it is an offence to deliberately or recklessly to destroy or damage their roosts, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from Natural England in England.

I am satisfied that the bat survey methodology and effort are adequate for the Ecologist to conclude that the building has low bat roost suitability and that bats are currently likely to be absent. I support the mitigation and enhancement recommendations. However, the Ecologist states that nest boxes should be installed “within the extended ownership” but fails to consider that the property is proposed for private sale and no additional blue-line land is shown on the location plan. The Ecologist has also failed to consider suitability of the site for protected common reptiles and invertebrates including Stag beetle *Lucanus cervus*, particularly the wood store.

If the application is approved planning conditions securing implementation in accordance with the Bat Roost Assessment Executive Summary and Section 4 and submission and approval of and on-site scheme of ecological enhancements, and external lighting scheme and removal of permitted development rights are imposed to ensure wildlife and biodiversity are maintained in line with the NPPF and local plan policy CP3, CP7 and TB23.

Conditions & Reasons (if required)

Subject to amended Existing and Proposed Site Plans showing all hedges, trees and shrubs will be retained, in addition to S106 obligations for SPA and SAMM contributions, I request the following planning conditions are included:

Condition: Works are to be carried out in full accordance with the recommendations provided in the Precautionary Working Method Statement and Section 4 of the Bat Roost Assessment V1 (Ecological, August 2025). Prior to the commencement of the development, details of biodiversity enhancements, to include bird boxes, and Schwegler bat box/es on or around the new buildings and native and wildlife friendly landscaping, shall be submitted to and approved in writing by the council and scheme shall include a timetable for its implementation. The biodiversity enhancements shall thereafter be installed as approved.

Reason: To incorporate biodiversity and ensure that protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 187 Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Prior to commencement of development a lighting design strategy for biodiversity for buildings, and any areas proposed to be lit for health and safety that is designed in accordance with best practice including in accordance with [Bats and Artificial Lighting at Night' Guidance Note GN 08 / 23](#) 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 amphibians, birds or invertebrates 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.

Reason To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 198 and Section 15, Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the written approval of the local planning authority. If within a period of **ten** years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted at the same place, unless the local planning authority gives its written consent to any variation

Reason: To ensure that protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 Section 15 Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

CL7

Reason: To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 Section 15 Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: No buildings, enlargement or alterations, enclosure, swimming or other pool, or container for the storage of oil or liquid petroleum gas shall be carried out without the express permission in writing of the local planning authority.

Reason: To safeguard the Countryside, Green Infrastructure, biodiversity habitat and species of principal importance. Relevant policy: NPPF 2024 Section 13 (Protecting Green Belt Land) and Section 15 (Conserving and Enhancing the Natural Environment), Local Plan Core Strategy policies CP1 and CP3 and CP11, and Managing Development Delivery policies TB21, TB23 and SAL06.

Date:	09/02/26	Signed:	T Cuss
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