

# MEMORANDUM

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| <b>From:</b>                | Duncan Fisher<br>Ecology Officer                                                                                                                                                                                           |                |        |
| <b>Service</b>              | WBC Ecology                                                                                                                                                                                                                | <b>App No:</b> | 250415 |
| <b>Address:</b>             | Shinfield Park, Whitley Wood Lane, Shinfield, Wokingham, RG2 9FW.                                                                                                                                                          |                |        |
| <b>Proposal:</b>            | Full application for the proposed redevelopment of site for flexible employment use (Use Class E(g)(ii)-(iii)/B2/B8) together with servicing areas, parking, landscaping and other associated works, including demolition. |                |        |
| <b>Type of Development:</b> | Major Heavy industry/storage/warehouse                                                                                                                                                                                     |                |        |
| <b>Site Visit Made:</b>     | 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

### Thames Basin Heaths SPA

The proposed development does not result in a net increase in dwellings within the linear mitigation zone so does not need to be assessed for likely significant effects on the Thames Basin Heaths SPA via the recreational pathway.

However, it is relevant to consider whether the project, alone or in combination, could result in likely significant effects on the Thames Basin Heaths SPA via the air pollution pathway. In particular, whether it will result in an increase in road traffic that will result in pollution of the SPA. There is no fixed zone of influence for the Thames Basin Heaths SPA for this pathway although typically a distance of 10km from the boundary of an SPA is used. As this application site is approximately 6km distant it is appropriate to consider whether traffic modelling is showing a risk.

In the submitted Ecological Assessment (Aspect Ecology, ref: 6856 EcoAp vf CK/BB/DS, February 2025), paragraph 3.1.6 considers the air pollution pathway. It includes the sentence:

*“Given the proposed development would not significantly retard the predicted decreases in vehicle emissions or background NOx concentrations, no likely significant adverse air quality effects on the SPA are anticipated, either alone or in combination with other plans or projects.”*

I cannot see any referenced evidence that shows how the proposal was assessed and the conclusion drawn that the development would not significantly retard the predicted decreases in vehicle emissions. Please can further information be supplied as to how the Ecological Assessment reached this view. Were any road junctions modelled to show that the number of new HGV movements is expected to drop to an insignificant number before getting close to the SPA?

### **Biodiversity Net Gain**

This application is supported by a Biodiversity Net Gain Assessment report (Aspect Ecology, ref: 6856 BNG vf CK/BB/DS, February 2025) and accompanying plans and statutory metric (calculation iteration: vf). Line by line comments have been made within the planning authority comments column in a copy of the statutory metric.

I can recommend that the local planning authority can agree the baseline habitats and conditions as described and quantified in iteration vf.

Comments regarding the detail of the post development scenario described in the metric have not been given as approval of that detail is resolved via the statutory condition, should permission be granted. However, it is relevant to consider the strategy for delivery of habitat biodiversity net gain at this point.

The applicant is proposing to deliver a unit net gain on-site via creation of medium distinctiveness habitats. These make a significant contribution to the biodiversity target and I therefore recommend that on-site monitoring of biodiversity net gain delivery is secured via a combination of conditions (securing a Habitat Management and Monitoring Plan - HMMP) and a planning obligation (to deliver and monitor the HMMP).

The BNG assessment recognises that trading rules cannot be met via on-site delivery. Considering the development proposals and the habitat types that are showing a shortfall, I am of the view that a reasonable attempt to follow the mitigation hierarchy has been taken and it is acceptable for the trading rules to be satisfied by securing off-site unit delivery.

Although the BNG post-development detail is not a matter to prevent determination of the application (being a conditioned matter). I do recommend that the applicant reviews the individual trees scoring within the metric. The 274 trees are densely planted and only those that are expected to be retained for the full 30 years should be counted. Further, the individual tree planting to the north-west the upper car park, north of unit 1, and west of units 2 and 3 might well be at a density whereby the habitat should be recorded as woodland rather than individual trees over grassland.

### **Soft Landscaping**

As mentioned above regarding BNG, it may be relevant to review the individual tree planting to confirm whether all the trees proposed can be retained for the next 30 years. I am not opposed to the density of planting to the frontages of the units if needed for immediate landscaping impact but if the design is such that spacing of the trees is expected through thinning within the first 30 years then this will need to be accounted for within the BNG metric.

Otherwise, I have minor comments regarding the Planting Schedules:

- a) The WP Woodland Planting table does not include planting density or percentage mix for each species. I recommend this is updated if it is to be part of an approved landscaping scheme.
- b) I recommend that *Quercus ilex* (Holm Oak) is an unsuitable species to be planting in proximity to ancient woodland. It is expected to become an invasive weed risk with climate change and so could be a risk to the composition of the nearby ancient woodland. I recommend this is removed from the landscaping as both a woodland species and a specimen tree. Hornbeam (*Carpinus betulus*) would be an acceptable alternative, ecologically.
- c) The Native Mixed Species Hedge table has inconsistency between the Latin names and common names given. Please can this be updated to be clear which species are specified. At the moment it is not proposing a mix that I think is likely to achieve a species rich native hedgerow as specified in the BNG metric. I recommend the inclusion of at least two more species and a lowering of the percentage of *Fagus sylvatica*.
- d) Amenity planting – amenity mixes 1 to 4 appear to not be specified in the schedule.

I recommend that minor adjustments to the schedule are made to address these concerns if the landscaping is to be approved at determination. Otherwise, these concerns can be resolved via a soft landscaping condition.

### **Ancient Woodland and Veteran Tree**

The site is recognised as being adjacent to ancient woodland (to the north) and close to a veteran tree (within blue line land to the west of units 2 and 3). I am satisfied that these have been accurately plotted so relevant buffer zones for irreplaceable habitat can be calculated.

Levels changes are proposed to the site and so, as per national guidance, it is relevant to consider whether a buffer zone larger than 15m is required to the ancient woodland adjacent to site. The application has submitted additional information to consider the potential for levels changes to alter groundwater and surface water flow into/across the ancient woodland (TRC, 11 February 2025). Looking at this alongside information about the existing surface water drainage, I am of the view that the changes in levels are unlikely to result in adverse impacts via additional drainage of the ancient woodland site. I therefore do not consider there to be an ecological need to extend the minimum buffer zone to the woodland to greater than 15m.

I can recommend that adequate buffer zones are proposed to the irreplaceable habitat. The reversion of some developed land currently in the buffer zone to more natural greenspace is welcomed and should be seen as a merit of the scheme – securing better protection for irreplaceable habitat.

### **Local Wildlife Sites**

The submitted Ecological Assessment recognises that there are two local wildlife sites adjacent to the site – Shinfield Park Nore's Hill and The Grove. I agree with the assessment that the proposed development will not result in direct loss of local wildlife site extent.

The Ecological Assessment makes mitigation recommendations to reduce the pollution risk to the local wildlife sites – see MC1, MC2, and MC3 in section 6 of the assessment. I recommend that the detail and implementation of these mitigation measures needs to be secured via a Construction Environmental Management Plan (CEMP) condition. In particular, the risk of polluting the existing surface water drainage network needs to be covered in more detail and the existing network flows into these two local wildlife sites.

I am concerned that the proposed drainage strategy seeks to switch all surface water flows towards The Grove local wildlife site and removes the part of the existing network feeding the ponds within Shinfield Park Nore's Hill. The Ecological Assessment does not appear to have considered the implications of this on the local wildlife site. Without an input, will these ponds be lost completely? Are they priority ponds in themselves? They certainly appear to be important for bat foraging locally, judging from the static detector surveys.

Can the loss or deterioration of these ponds be avoided? If so, what measures need to be in place to ensure this? I recommend that the local planning authority seek further information to be confident that the drainage strategy is not going to be harmful to the adjacent local wildlife site.

### **Habitat of Principal Importance**

I agree with the Ecological Assessment that the Natural England Priority Habitat Inventory has included some parts of the developed site that do not qualify as lowland mixed deciduous woodland. The mapped extent of lowland mixed deciduous woodland given in the Ecological Assessment is more accurate having been assessed on the ground.

The proposal would still result in the loss of a small area of lowland mixed deciduous woodland habitat of principal importance (measured as 0.015ha) in order to accommodate Unit 4. I can recommend that the iterative design process has sought to apply the mitigation hierarchy and, under the process set out in local plan policy CP7, it is reasonable to consider the compensation stage for this loss.

The proposed landscaping includes woodland planting around the northern edge of the site. This is in a good location to strengthen the woodland connectivity between Nore's Hill ancient woodland and a fragment of woodland to the east of the application site.

This woodland planting in combination with the off-site delivery of lowland mixed deciduous woodland biodiversity net gain units provides sufficient compensation for the 0.015ha loss of lowland mixed deciduous woodland in the south-western corner of the site.

### **Protected Species**

#### **Bats**

I can recommend that the applicant has supplied sufficient survey information for the local planning authority to be able to consider the likely use of the site by this species.

I agree that the static detector records indicate that the main building on site is unlikely to be used as a hibernation roost. I agree that the building assessments and emergence surveys indicate that the buildings on site are unlikely to contain bat roosts.

The assessment of roosting potential in trees identified T48 as having an I-type potential roosting feature. Contrary to paragraph 5.3.32 of the Ecological Assessment, this tree is indicated for removal in the Arboricultural Impact Assessment (Aspect Arboriculture, ref: 12218\_AIA.001, February 2025). Given that it is an I-type potential roosting feature and a number of bat boxes are proposed, I am of the view that no further survey work is required prior to determination. However, I do recommend that mitigation measures for bats during the removal of this tree are secured in detail via a CEMP condition.

Paragraphs 5.3.26 to 5.3.29 evaluate the static detector survey results to indicate that an assemblage of bats of district significance is present locally. The category of significance 'district' is introduced by the applicant's ecologist – the Bat Mitigation Guidelines referenced only giving thresholds by which to consider an assemblage as of county/regional/national importance. The known range of bat species means Berkshire is not a good fit for the Southern England scoring for bat assemblage, particularly in relation to the county significance threshold.

The recorded presence of Serotine and Barbastelle (both assessed as Vulnerable in England under IUCN guidelines) makes me think that the adjacent local wildlife sites are probably of county significance for bat foraging and commuting. However, I accept that the detector evidence shows that the use of the application site for foraging and commuting by bats drops off around the existing built form. In other words, the existing important ecological features are surrounding the site and not within the area proposed for redevelopment.

To avoid harm to the important foraging and commuting features locally, a sensitive lighting strategy is required to ensure that the woodlands and ponds surrounding the site are not subjected to significant additional artificial light – which would make these features less suitable to light sensitive bat species. Paragraph 5.3.28 picks up on this need and references an Indicative External Lighting Layout (Drawing No. 24114-MBA-EX-SP-DR-E-0001). An External Lighting Strategy Report (MBA Consulting Engineers, version: Rev PL2, February 2025) has been submitted and this contains the above referenced drawing.

Broadly, the lighting strategy takes on board the majority of lighting recommendations given in mitigation measure MC10 in the Ecological Assessment. I am concerned that the schedule in the drawing does not specify a back light shield for column C1. If this cannot be rectified before determination, I recommend that a lighting for light sensitive species condition is applied to resolve the final detail of external lighting. Should this condition be applied, I would be able to recommend that the proposal will not adversely impact this protected species group.

#### Dormouse

I can recommend that the local planning authority can be confident that this proposal is unlikely to adversely impact this protected species.

### Reptiles

Based on the evidence submitted, I can recommend that the local planning authority can be confident that this proposal is unlikely to harm protected reptile species and is unlikely to adversely impact the local conservation status of reptile species of principal importance.

### Breeding Birds

Subject to reasonable avoidance measures applied during construction – secured via a CEMP condition – I can recommend that the local planning authority can be confident that this proposal is unlikely to harm breeding birds or adversely affect the conservation status of bird species of conservation concern recognised as breeding locally.

### **Species Specific Enhancements**

Paragraphs 6.2.7 to 6.2.12 of the Ecological Assessment make recommendations for enhancements for faunal species that can be incorporated into the development or within the part of the local wildlife site within blue line land. Under paragraph 187 of the NPPF and local plan policy TB23, it is appropriate for the local planning authority to seek delivery of these enhancements in the course of the development. I recommend that detail and delivery of these enhancements is secured via an appropriately worded condition.

## **Conditions & Reasons (if required)**

### **Soft Landscaping**

Standard condition CL5 (Landscaping Details Large Scale) with policy TB23 included within the reason as the landscaping detail is directly relevant to understanding what biodiversity net gain habitats are being delivered post development.

### **Habitat Management and Monitoring Plan**

British Standard BS42020:2013 standard condition D.4.5 (Landscape and ecological management plans) can be adapted to secure a Habitat Management and Monitoring Plan that includes maintenance of on-site habitats to deliver the mandatory biodiversity net gain target.

**Condition:** *A habitat management and monitoring plan (HMMP) shall be submitted to, and be approved in writing by, the local planning authority prior commencement of the development. The content of the HMMP 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 – to include on-site measures necessary to deliver biodiversity net gain.*
- 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 HMMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the HMMP 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 secure an appropriate management plan to deliver and maintain on-site biodiversity net gain.

NB – If a LEMP condition is already recommended by another consultee, the requirements of that condition and the HMMP condition will need to be merged so there are not two management plans (potentially causing conflicts).

### **Construction Environmental Management Plan**

British Standard BS42020:2013 standard condition D.4.1 (Construction environmental management plans) can be used. This should adapt bullet point c) to reference delivery of mitigation measures recommended in the submitted Ecological Assessment:

- 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) *to cover, as a minimum, mitigation recommendations MC1 to MC6, MC8 to MC9, and MC11 to MC13 from the submitted Ecological Assessment (Aspect Ecology, ref: 6856 EcoAp vf CK/BB/DS, February 2025).*

**Reason:** To secure mitigation measures for protected species and species of principal importance during construction, as appropriate under local plan policies CP7 and TB23 and ODPM circular 2006/05.

NB – If a CEMP condition is already recommended by another consultee, the requirements of that condition and the D.4.1 condition will need to be merged so there are not two construction management plans (potentially causing conflicts).

### **Lighting for Light Sensitive Species**

British Standard BS42020:2013 standard condition D.3.5 (Lighting design strategy for light-sensitive biodiversity) can be used.

**Reason:** *To secure mitigation measures for protected species and species of principal importance in the operational phase, as appropriate under local plan policies CP7 and TB23 and ODPM circular 2006/05.*

### **Species Specific Enhancements**

**Condition:** *Prior to commencement, a detailed strategy for biodiversity enhancements to the site, in line with the recommendations given in*

*paragraphs 6.2.7 to 6.2.12 inclusive of the submitted Ecological Assessment (Aspect Ecology, ref: 6856 EcoAp vf CK/BB/DS, February 2025), shall be provided to the local authority for its approval. Once approved the strategy shall be implemented in full unless otherwise agreed by the local authority in writing.*

**Reason:** *to secure biodiversity enhancements in line with development as appropriate under local plan policies CP7 and TB23, and the National Planning Policy Framework paragraph 187(d).*

**Date:**

24 June  
2025

**Signed:**

D. Fisher