

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	251892
Address:	Land lying to the East Side of Whitley Wood Road, Off Mitford Close, Shinfield, RG2 8JQ.		
Proposal:	Full application for the proposed erection of 4 no. dwellings in two semi-detached blocks with associated amenity space, landscaping, parking and access, plus works to the adopted highway and relocation of 1 no. streetlight.		
Type of Development:	Minor Dwellings (1-9)		
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 reviewed for this application proposal:

- Preliminary Ecological Appraisal and Ground Level Tree Assessment Report, Version 001, 28.03.25 by Alyne Ecology.
- Biodiversity Net Gain Design Statement, Version 002, 27.08.2025, by Alyne ecology. Hereby known as 'BNG Report'
- Statutory Biodiversity Metric Tool, Version 001, 20th March 2025 by Aylne Ecology.
- Report: Bat Roost Assessment – Trees, Mitford Close, 25th June 2025, by PAD Ecology.
- Site Location Plan – Removed Vegetation, August 2025, by Laura Nico Studios.
- Landscape Proposals, August 2025, by Laura Nica Studios.

Biodiversity Net Gain

The application ecologist has provided sufficient survey information, and I am in agreement with the classification of baseline habitats as reflected in the Statutory Biodiversity Metric Tool.

The BNG report and Statutory Metric Tool indicate a -92.35% biodiversity net loss and a further 100% biodiversity net loss for linear watercourse habitats. The

Statutory Biodiversity Net Gain is a mandatory legal framework that requires all developments to deliver at least 10% increase in biodiversity value under the Environment Act 2021. In accordance with statutory biodiversity net gain, developments must align with the biodiversity hierarchy, the hierarchy is as follows:

- *“first, in relation to onsite habitats which have a medium, high and very high distinctiveness (a score of four or more according to the statutory biodiversity metric), the avoidance of adverse effects from the development and, if they cannot be avoided, the mitigation of those effects; and*
- *then, in relation to all onsite habitats which are adversely affected by the development, the adverse effect should be compensated by prioritising in order, where possible, the enhancement of existing onsite habitats, creation of new onsite habitats, allocation of registered offsite gains and finally the purchase of biodiversity credits”.*

Paragraph: 008 Reference ID: 74-008-20240214

In this instance, the baseline habitat of ‘other woodland: broadleaved’, the urban trees and the bramble scrub are of all medium distinctiveness. As such, the proposed development must show the avoidance of adverse effects and if not avoidable, provide in priority order, compensation through enhancements or the creation of new on-site habitats before finally the purchase of credits. Although the application ecologist does list the biodiversity hierarchy within the PEA and state the application will need to purchase biodiversity credits, there is no justification on any avoidance measures or reason for absence, nor does the layout show any compensation. Under the current layout proposal, without justification of why the Biodiversity Gain Hierarchy has not been adhered to, this application does not discharge the statutory obligation of 10% biodiversity net gain and therefore I currently object to the development. Furthermore, the Biodiversity Gain Hierarchy is stipulated within Articles 37A and 37D of the Town and Country Planning (Development Management Procedure) (England) Order 2015, therefore is not in line with national legislation.

Protected Species

I agree with the application ecologist that several protected species which include bats, birds, badgers, great crested newts and hazel dormice have the possibility of being impacted by this development.

I agree with application ecologist that an EcOW is required for all vegetation removal as a form of mitigation and is to be secured by a Construction Environmental Management Plan to secure appropriate detailed mitigation plan and maintain favourable conservation status of several protected species.

All other protected species listed within the Preliminary Ecological Appraisal and Preliminary Roost Assessment do not pose any concerns.

Great Crested Newts

As stated within the PEA, the application site does fall within a green impact zone for great crested newts, according to Nature Space. I agree with the application ecologist, that as a pond is within 450m of the application site, a precautionary

method statement is required to ensure the development does not harm this protected species, in line with national policy Countryside and Wildlife Act 1981.

Details of the precautionary method statement is to be secured by a CEMP condition.

Bats

The application ecologist has provided sufficient evidence to demonstrate that the onsite woodland and urban trees do not currently offer suitable roosting features for bats, although they do provide appropriate foraging habitat. The Bat Roost Assessment Report by PAD Ecology confirms that potential roosting features in the trees have been assessed and found unsuitable at this time. However, trees are transitional features in the landscape—their structure and condition change over time, meaning their suitability for roosting may increase in the future.

Therefore, I recommend that all trees on site be soft-felled, with appropriate mitigation measures secured and included in the Construction Environmental Management Plan (CEMP).

I agree with the application ecologist that there is a need for a lighting plan to ensure the artificial lighting of the development does not impact foraging bats both within the development and the neighbouring local wildlife site. I recommend securing a sensitive light plan by a Lighting Design Strategy for Light Sensitive Biodiversity Condition.

I agree with the application ecologist that artificial biodiversity enhancements are required to compensate for the loss of potential roosting features. Biodiversity enhancements for this species are to be secured and detailed through a Species compensation and enhancement plan.

Hazel Dormice

I agree with the application ecologist's assessment that the bramble scrub and woodland understorey on site form part of a connective habitat corridor linking to off-site woodland, which has the potential to support hazel dormice. I agree that given the limited scale and extent of suitable habitat within the site, that undertaking presence/absence surveys for the species would be disproportionate.

However, it is noted that the proposed mitigation measures have been based on outdated guidance. As of 2023, the *Hazel Dormouse Mitigation Handbook* published by the Mammal Society provides the most current best practice. I recommend that the mitigation strategy be reviewed and updated in line with this handbook to ensure compliance with the latest guidance.

Species of Principle Importance

Reptiles

I agree with the application ecologist that debris piles and habitat have the potential to support foraging and hibernating reptiles. I agree with the application ecologist mitigation for the species in the form of precautionary method statement to be secured as apart of the CEMP.

Hedgehogs

The application ecologist notes that the Application Site provides suitable foraging and commuting habitat for hedgehogs, of which I agree. However, does not list any biodiversity enhancement opportunities for this species. Policy TB23: Biodiversity and Development, 2c stipulates that all new developments should be ecologically permeable through the provision of wildlife corridors. To ensure permeability of this site for hedgehogs, I recommend that a detailed ecological permeability plan, relevant for hedgehogs, is secured as part of the above recommended species compensation and enhancement condition.

Policy TB23: Biodiversity and Development, the Wokingham Development Plan.

As the current landscape proposal stands it is not policy compliant. The site is located adjacent/neighbouring Local Wildlife Site 'Nores Hill Woods', which consists of lowland mixed deciduous ancient woodland, both a local and national priority habitat. Under Policy TB23 Biodiversity and Development 2b) all development proposals will provide appropriate buffer zones between developments and habitats of species importance and 2c) ensure new developments are ecologically permeable with the protection and provision of wildlife corridors. This development removes a wildlife corridor, namely the bramble scrub and provides no suitable compensation for the removal of the corridor and does not provide a buffer zone between the new development and the Local Wildlife Site.

As the planning application currently stands, I object to the proposed development on the grounds that the layout does not align with the biodiversity gain hierarchy and therefore fails to meet the statutory Biodiversity Net Gain (BNG) requirement. In addition, the proposal is not compliant with Policy CP7 of the Wokingham Development Plan, specifically Policy YB23: *Biodiversity and Development*.

Should the planning officer be minded to approve the application, the planning conditions are secured to ensure the development does not result in harm to protected species or species of principal importance.

Conditions & Reasons (if required)

Construction Environmental Management Plans (CEMP):

Condition: No development shall take place (including demolition, ground works, vegetation clearance, tree felling) 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) 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) or similarly competent person.

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 otherwise agreed in writing by the local planning authority

Reason: To ensure mitigation measures for protected and priority species are appropriate and secured by local plan policy CP7 and TB2

Lighting design strategy for light-sensitive biodiversity – Condition

Prior to occupation, a “lighting design strategy for biodiversity” for bats specify buildings and boundary 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 bat species 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 ensure foraging and roosting bats are not impacted by this development, in line with policy CP7 – Biodiversity of Wokingham Core Strategy.

Species Compensation and Enhancement Condition

Condition: Prior to construction, a scheme for ecological permeability and biodiversity compensation and enhancement, such as the incorporation of bird and bat box, and access points for hedgehogs 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:

Signed: