

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260287
Address:	Land to the rear of 16 and 17 Arnside Close, Twyford, RG10 9BS.		
Proposal:	Full application for the proposed erection of 1 no. detached dwelling with associated parking, amenity space and access including creation of a new dropped kerb.		
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 Planning and Design and Access Statement (JCPC, January 2026) and reviewed the plans and elevations submitted in support of the application.

Biodiversity Habitat Net Loss

The development is exempt from a statutory biodiversity gain condition required by virtue Schedule 7A of the Town and Country Planning Act 1990). However, the development is contrary to the NPPF, Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within the Planning System, and Local Plan policies CP3, CP7 and MDD TB23 ensure that development should not result in a net loss of biodiversity and that unavoidable habitat loss is compensated. I disagree that the applicant has demonstrate that there is no reasonable likelihood of protected species either being present on the site or affected by the proposed development.

The existing Highway trees and the boundary hedgerows removed to facilitate the development should have been shown on existing and retained and compensation features shown on proposed plans. I don't agree that the application form has been completed accurately as there are/were both trees and hedges on and adjacent to the development site that should influence the development and are important part of local landscape character (as well as biodiversity). Government requires that the location plan should include landscaping, car parking and open areas around buildings. The WBC Local Validation list requires that the site plan to identifies the site in relation to its surroundings and should show the site boundaries.



Species of Principle Importance

I disagree with the application form and the Planning and Design and Access Statement and consider that protected and priority species including Stag beetle, bats and breeding birds may be directly or indirectly affected within the site or adjacent land. The applicant has failed submit any ecology survey or proposed any mitigation to prevent detrimental impacts, particularly to birds and compensate the loss of hedgerow. In the absence of compensation, reduction and avoidance mitigation measures and compensation for nesting opportunities and replacement trees and shrub or hedgerow habitat and enhancements for wildlife, the development is contrary to the NPPF and local plan policy.

Planning Policy

According to policy CP7 Development which may harm habitats or, species of principle importance or features of the landscape that are of major importance for wild flora and fauna whether directly or indirectly, will only be permitted if it has clear demonstrated that the need for the proposals outweighs the need to safeguard the nature conservation importance, that no alternatives site that would result in less or no harm is available which will meet the need; and mitigation measures can be put in place to prevent damaging impacts. Or appropriate compensation measures to offset the scale and kind of losses are provided.

Managing Development Delivery Policy TB23 states that planning permission for development proposals will only be granted where they comply with policy CP7 and also demonstrate how they:

- a) Provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing;....
- c) Ensure that all existing and new developments are ecologically permeable through the protection of existing and the provision of new continuous wildlife corridors, which shall be integrated and linked to the wider green infrastructure network.

The removal of Highway trees to the south and the hedgerow in the north and east of the site will have a negative impact on foraging and commuting wildlife and fail to ensure the existing wildlife corridor is retained.

Policy CP1 states planning permission will be granted for development proposals that maintain or enhance high quality environment, minimize emissions of pollutants, limit adverse effects on water quality, provide attractive schemes, and contribute to zero-carbon development. Removal of existing landscape features such as hedges and street trees directly negatively impacts all of the above, and I cannot agree that the development meets the local plan definition of sustainable development.

Summary

The applicant fails to take account of potential impacts on protected species support by the application site and the removal of habitat to facilitate the development or proposal mitigation, compensation and enhancement. For the above reasons the application may be refused on grounds of lack of ecological information, impact to wildlife, biodiversity habitat net loss of and failure to comply with planning policy.

Conditions & Reasons (if required)

If the application is subsequently approved, a self-build obligation must be secured by legal agreement.

Date:	23/04/26	Signed:	T Cuss
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