

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	260596
Address:	Land Opposite Junction Of Forest Road &, Foxley Lane, Binfield, Bracknell, Berkshire.		
Proposal:	Full application for the proposed erection of stable block, consisting of no.3 stable stalls with associated hardstanding driveway.		
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 reviewed:

- Preliminary Ecological Appraisal, 23rd October 2025, Revision 01 by Environmental Business Solutions
- Biodiversity Net Gain Assessment, 27th February 2026, Revision B by ET Planning LTD

Biodiversity Net Gain

A Net Gain Assessment (Aspect Ecology, ref: 1005672, March 2022) and a full Defra Statutory metric spreadsheet has been submitted in order to consider if the application can demonstrate a 10% net gain, as required by Environmental Act 2021.

I disagree with the current baseline proposed. Section 3.2.1 of the PEA states “..there were areas of scrubland within the grass (comprising bramble *Rubus fruticosus* and goat willow *Salix caprea*), but this amounts to less than 20% of the total area”, however this has not been reflected in the A-1 Habitat Baseline tab of the submitted Statutory Metric.

The Statutory Biodiversity Metric requires that all habitats within the red line boundary are included within the baseline assessment. Habitats are recorded as distinct habitat parcels based on changes in type, condition or distinctiveness, and

there is no size threshold below which habitat features can be excluded from assessment. As such, the baseline and the Appendix 2: Baseline Habitat Plan. habitats plan will require a revision to reflect scrub present on site.

The submitted Biodiversity Metric demonstrates that the proposal does not achieve the statutory requirement of a minimum 10% biodiversity net gain in habitat units on site and relies on a mix of on-site habitat retention and off-site habitat enhancement and creation. The metric indicates off-site habitat creation only, however, as the baseline is of modified grassland and the creation of neutral grassland, this should be considered enhancement as opposed to creation unless justified otherwise.

The use of blue-line land to deliver the required biodiversity net gain is acceptable in principle, subject to compliance with the Environment Act 2021 and the statutory Biodiversity Net Gain framework. Any off-site biodiversity land relied upon must be legally secured for the required 30-year management period through a planning obligation and registered on the statutory Biodiversity Gain Site Register prior to commencement.

In addition, a Habitat Management and Monitoring Plan (HMMP) is required to include both the on-site and off-site habitat retention, enhancement and creation to ensure the successful delivery of the mandatory 10% biodiversity net gain. As the HMMP will apply to both the application site and the blue-line land, it is recommended that the planning obligation also secures the implementation, management and monitoring requirements of the HMMP.

Protected Species

In accordance with the CIEEM Guidelines for Preliminary Ecological Appraisal (GPEA), BS42020:2013 Biodiversity – Code of Practice for Planning and Development, and the requirements of the National Planning Policy Framework (NPPF), a Preliminary Ecological Appraisal (PEA) should provide sufficient baseline ecological information to identify habitats and species constraints, assess likely ecological impacts, and determine the need for mitigation, compensation, enhancement and any further protected species surveys prior to determination of the application.

In this instance, the submitted PEA does not provide sufficient ecological information to adequately demonstrate that protected and priority species would not be adversely affected by the proposed development. The assessment is limited to breeding birds, great crested newts and badgers, and does not provide sufficient justification as to why other protected or priority species have been scoped out of consideration, nor does it demonstrate how the habitats present are unsuitable to support such species. Furthermore, the mitigation proposed for great crested newts does not appear proportionate to the suitability of the surrounding habitat and the potential likelihood of the species being present on or adjacent to the site. However, great crested newts will not be addressed further within these comments as NatureSpace are the relevant consulting body.

The site comprises modified grazed grassland, mature trees and scrub, whilst the surrounding landscape includes open grassland, mature trees and areas of lowland mixed deciduous woodland to the north and west of the application site. Collectively,

these habitats are suitable to support a range of protected and priority species, including foraging, commuting and potentially roosting bats. However, no bat assessment has been undertaken. Bats are European Protected Species under the Conservation of Habitats and Species Regulations 2017 (as amended) and are a material consideration in the planning process. In the absence of sufficient survey information demonstrating that bats would not be affected by the development, the current ecological information cannot be considered adequate. This is of particular concern given that three trees are proposed for removal and no ground-level tree assessment has been undertaken to identify whether these trees contain potential roost features.

In addition, species such as slow worm, grass snake, adder and common toad are Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006 and are relevant to the biodiversity objectives of Wokingham Borough Core Strategy Policy CP7. The application has not adequately demonstrated that these species are absent from the site, nor has it provided sufficient assessment of habitat suitability or identified appropriate mitigation measures. Given the presence of surrounding waterbodies, grazed grassland, mature tree lines providing linear connectivity between habitat parcels, and adjacent woodland habitats, the site appears to have the potential to support a range of protected and priority species which have not been sufficiently assessed through the submitted PEA.

I recommend that the PEA is revised to include a comprehensive assessment of relevant protected and priority species, including clear justification where species are scoped out and evidence demonstrating why the habitats present are considered unsuitable to support them. The assessment should also provide proportionate mitigation measures reflective of the suitability of the site and the likelihood of species presence, together with consideration of the potential impacts of the development on the surrounding landscape, ecological connectivity and adjacent priority habitats.

Biodiversity Enhancements

Chapter 15 of the National Planning Policy Framework (NPPF) and the Wokingham Borough Development Plan require development proposals to deliver measurable biodiversity benefits through building layout, design, or landscaping.

The applicant's ecologist has recommended the incorporation of bat and birds. As no specific quantities have been set out, it is considered reasonable and proportionate to require the installation of one bat box and one bird box, integrated into the fabric of the new building. To ensure delivery of these biodiversity enhancements, it is recommended that a Species Compensation and Enhancement condition is attached to any grant of planning permission

Conditions & Reasons (if required)

A Habitat Management and Monitoring Plan (HMMP)

A HMMP shall be submitted to, and be approved in writing by, the local planning authority prior to the 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.
- 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 appropriate management for the on-site habitats in order to deliver the mandatory biodiversity net gain targets.

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:

Signed: