

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	252782
Address:	Former Prince Bros / Grove Service Station, Old Bath Road, Charvil, Twyford, RG10 9QJ.		
Proposal:	Full application for the proposed change of use from service station to a fuel oil storage and distribution facility including demolition of 2 no. existing buildings and a garage and the recladding of the existing building, installation of 8 no. fuel oil storage tanks and construction of retaining structures, plus refurbishment of hardstanding, car parking and other associated works.		
Type of Development:	Minor General industrial/storage/warehouse (1-999 sqm)		
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

Documents submitted and reviewed in support on this application:

- Bat Emergence Survey, 30th June 2025, Version Final by James Webster.
- Ecological Impact Assessment, 20th October 2025, Ref: RHE.4456 by Rachel Hacking Ecology.
- Planting Plan, April 2025, Revision B by Dep Landscape Architecture LTD.
- Construction Environmental Management Plan (CEMP), Version 1.1 by Speedy Fuels and Lubricants.
- Proposed External Lighting, March 2025, Dwg no: 80 by Partington and Associates Limited Structure Design Consultants.
- Proposed Site Layout, March 2025, Dwg no: 60 by Partington and Associates Limited Structure Design Consultants.

Biodiversity Net Gain

I agree with the application ecologist's assessment and categorisation of baseline habitats and proposed habitats within in the PEA and is consistent with the submitted Statutory Metric Tool.

Based on The Statutory Metric tool and Biodiversity Net Gain Chapter within the PEA provided, it is possible to discern the strategy that this development proposes to achieve the statutory requirement for a 10% net gain in habitat and hedgerow units. However, trading rules have not been met, therefore the application site will be required to either offset these units to meet trading rules or the purchase of biodiversity credits.

With regards to the 10% net gain, a large proportion of the net gain is due to the on-site creation/planting of neutral grassland in moderate condition, small native trees in moderate condition and mixed scrub. To ensure the proposed habitats are maintained in moderate condition for 30 years, details of management and monitoring will need to be secured through a Habitat Management and Monitoring Plan (HMMP) and section 106 agreement. I recommend a planning obligation is applied to secure monitoring of the proposed biodiversity on-site net gain measures as agreed in the HMMP and to ensure that trading standards have been met, either through offsetting or the purchase of credits.

Protected Species and habitats

The PEA provides clear justification as to protected species that are impacted within the development and why other species have been ruled out based on habitat type and suitability. All other species mentioned within the PEA are not a concern and unlikely to be impacted by this development. The following species are of concern to be impacted and require mitigation:

Herpetile species

The PEA indicates that great crested newts have been recorded as close as 0.66km, with a suitable pond 250m southwest of the site. Great crested newts are a European protected species under the Conservation of Habitats and Species Directive 2017 making it an offence to injure, kill, disturb or damage a breeding and resting site. In addition to this, the southern and eastern boundary of the site are considered to provide suitable terrestrial, foraging and resting habitat for great crested newts, common amphibians and reptiles. All amphibians and reptiles are protected under the Wildlife and Countryside Act 1981, and other reptile and amphibian species are further protected under the NERC Act 2006.

The application ecologist has provided precautionary mitigation measures to ensure that great crested newts and other herpetiles are not harmed during any construction works. I agree with the precautionary approach and suggest securing these remedial mitigation measures with a suitable planning condition. The common planning condition used to secure these details are a Construction Environmental Management Plan, although one has been submitted, it does not include any details relating to mitigation measures for protected species and priority habitats and therefore would not discharge a CEMP condition. As such, I recommend securing these details with a CEMP: Biodiversity, a report that relates specifically to biodiversity.

Birds

Under the Wildlife and Countryside Act 1981, it is a criminal offence to remove, damage or destroy the nest of any wild bird and their eggs. The EIA proposes the removal of three trees and states the boundary features of the site offer suitable

nesting and foraging habitat for birds. Suitably, the application ecologist has suggested good practice mitigation measures that includes 'no works are to take place during nesting season within March-August', if works must take place within the season an Ecological Clerk of Works is required. I support these measures and recommend securing them with a CEMP: Biodiversity, as mentioned above.

Bats

The application ecologist has provided clear photographic evidence and justification with regards to ground tree assessment for potential roosting features. Four trees have been found to offer potential roosting features for bats, of which three trees are opposite the southern boundary and one on the north boundary. All trees are to be retained.

However, in terms of potential roost assessment of buildings, there is very limited information provided both within the EIA and the Bat Survey Report to justify the categorisation as negligible for Building 2 & 3 and low suitability categorisation of building B1. Not only was there no description of the buildings in terms of material and roosting features but no photographic evidence was submitted to show these buildings.

Without photographic evidence to determine the roosting potential of the building, it is difficult to ascertain if an appropriate emergence survey effort has been undertaken. The application site and its buildings are located within suitable roosting habitat area according to our Bat Roost Habitat Suitability Model, additionally the application site is surrounded by optimal habitat for foraging and roosting in the form of lowland deciduous woodland and wet woodland. As such optimal habitat surrounds the site it's essential to ensure this application site has not been under surveyed. As B4 is still to be surveyed, I recommend revising the EIA to include photographic evidence, building and features description with justification of roost categorisation, and to include PRA survey evidence of B4.

Biodiversity Enhancements

The EIA recommends biodiversity enhancement in the form of generalised bat and bird boxes integrated into the new buildings and 'hedgehog holes' to be implemented in any closed board fencing or brick walls to ensure permeability of the site. I agree with the biodiversity enhancements as this complies with Wokingham Borough Development Plan, Policy TB23. I recommend a further enhancement of insect hotels within the southern boundary due to the known assemblage of invertebrates within Twyford Gravel Pits, providing an opportunity for local wildlife.

I recommend securing details of these enhancements via an appropriate planning condition, of a species compensation and enhancement condition. This document should include details on bat and bird boxes, justification for choice and how it is suitable for the application site and support the Wokingham Biodiversity Action Plan.

Local Wildlife Site – Twyford Gravel Pits

According to EIA, the CEMP submitted under this application is to include prescriptions for remedial measures and biodiversity zones and take into consideration the constructional impacts on the adjacent Local Wildlife Site, as such no measures are described within the EIA.

However, the CEMP submitted does not take include any biodiversity mitigation measures, as such as specific CEMP: Biodiversity will need to be produced that focuses on protection of biodiversity zones and mitigation measures required to ensure this priority habitat does not have any constructional or long-term impacts. The Local wildlife site is home to rare protected birds such as fieldfare, a red listed bird species of conservation concern and nationally important assemblage of invertebrates, therefore it essential to ensure construction works do not harm this habitat and remedial measures to be put into place.

It is also recommended for the HMMP to describe how the boundary habitats will be managed to ensure the surrounding habitats are not impacted by long-term effects.

Lighting

A Lighting design plan has been submitted for this application; Proposed External Lighting, March 2025, Dwg no: 80 by Partington and Associates Limited Structure Design Consultants. The lighting plan indicates proposed high lux levels around the southern and western boundary. Some areas of the boundary are illuminated as high as 10 lux (eastern boundary) and 4.6 lux on the southern boundary. The Bat Survey Report recorded three bats foraging within the application site: common pipistrelle, soprano pipistrelle and Bechstein bats. Of those three bats, Bechstein are described as easily impacted by luminaries, the species has been recorded showing advice behaviour from illumination as low as one lux. Additionally, pipistrelles the species will also show difficulty foraging in areas as high as 10 lux.

All bat species and their roosts are protected under the Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017 making it illegal to harm or disturb them. Wokingham Core Strategy, Policy CP7 – Biodiversity specifies that development will only be permitted which may harm species of principal importance if the proposal demonstrates mitigation measures to prevent damaging impacts and appropriate compensation measures. As this lighting plan currently stands, it will cause disturbance to a protected species, impacting foraging and roosting behaviour and as such does not comply with national and local legislation.

I advise amending the lighting plan to follow ILP and Bat Conservation Trust Guidance Note 08/23 ([GN08 Bats and Artificial Lighting](#)) to ensure bat friendly lighting and for the southern and eastern boundary to be stipulated as dark corridors with lighting less than 1 lux. I recommend securing these details and ensuring appropriate lighting with a planning condition.

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.

Construction Environmental Management Plans (CEMP) Biodiversity:

Condition: No development shall take place (including demolition, ground works, vegetation clearance) 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 TB23.

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.

Lighting Design Strategy for Light-Sensitive Biodiversity

Prior to occupation, a “lighting design strategy for biodiversity” for the application site 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 and nocturnal wildlife 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 comply with the Countryside Act 1981, the Conservation of Habitats and Species Regulations 2017, and the Wokingham Core Strategy, Policy CP7 – Biodiversity.

Date:	12/01/26	Signed:	L.Aparo
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