

Date: 15 July 2025
Application: 250267



**WOKINGHAM
BOROUGH COUNCIL**

WBC Ecology

Development Management &
Compliance

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Dear WBC Ecology,

Full Planning Approval Consultation

Application Number: 250267

Applicant: Mr Thomas Roberts

Site Address: 31 Barkham Ride, Wokingham, RG40 4EX

Parish: Finchampstead

Grid Reference: Easting - 478994, Northing - 165846

Type of Development: Other Change of Use

Proposal: Demolition of the existing dwelling and use of land as an extension to Victoria Gardens Residential Park Home Estate, with the stationing of 35 park homes (permanent C3 use class accommodation) and the construction of an ancillary community building (use class F2(b)) and park office (use class Eg(i))

Case Officer: Connie Davis

Development Management has received the above application and we require your comments on the proposal using the recommended memorandum below. The documents associated with this are available to view in NEC DM using the application number 250267. Alternatively, public documents are available to view on the Council's planning application search page: [Wokingham Borough Council Online Planning](#).

Please index your response into NEC DM against the application. If you are recommending conditions, you should give a reason with reference to relevant policies. A list of standard conditions can be found on the Z Drive at: [Z:\Standard Planning Conditions](#).

Your observations are required in respect of this application within **10 working days** of the above date or **15 working days** if the development type is classed as a major development.

Yours sincerely,
Development Management & Compliance

MEMORANDUM

From:	Cath Holwill		
Service	WBC Ecology	App No:	250267
Address:	31 Barkham Ride, Wokingham, RG40 4EX.		
Proposal:	Demolition of the existing dwelling and use of land as an extension to Victoria Gardens Residential Park Home Estate, with the stationing of 35 park homes (permanent C3 use class accommodation) and the construction of an ancillary community building (use class F2(b)) and park office (use class Eg(i))		
Type of Development:	Other Change of Use		
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

The application site comprises land and buildings within the curtilage of 31 Barkham Ride located directly east of Rooks Nest Wood Country Park.

The application follows planning application 230791 [*Outline application for the proposed erection of 26 no. dwellings following demolition of the existing dwelling and garage*] which was approved in September 2024. Initial proposals to erect 35 mobile homes were submitted, these have subsequently been revised to provide 31 homes and community building (with associated gardens and parking.)

Previous Comments:

Previously our initial comments related to the closeness of the proposed dwelling gardens to the northern boundary. These lie within 15 metres of the woodland priority habitat, separated by a narrow ditch. However, it is understood that this level of proximity is considered acceptable, and that a condition “*will be imposed to set the parameter that new development (built form) cannot be erected within 15m of the northern boundary so as to inform the final layout of the site at Reserved Matters stage*”

On that basis, this approach is acceptable to us. Ultimately, it will be for the Planning Officer to determine whether this is acceptable within the overall planning balance. On the whole however, we would suggest that this arrangement is ok

Designated Sites

The proposed development site is within 5km of the Thames Basin Heaths Special Protection Area (SPA) and the proposals are to increase the number of dwellings by 26 units. SPA's are protected in UK law by The Conservation of Habitats and Species Regulations 2010.

Policy CP8 of the Wokingham Core Strategy states that

Development which alone or in combination is likely to have a significant effects on the Thames Basin Heaths Special Protection Area will be required to demonstrate that adequate measures to avoid and mitigate any potential adverse effects are delivered

The Habitat Regulations Assessment of the Wokingham Draft Local Plan Update document states that within the zone of 400m to 5km from the Thames Basin Heath SPA, additional residential development proposals will be required to make financial contributions towards avoidance and mitigation measures, including SANG (Suitable Alternative Natural Greenspace) and SAMM (Strategic Access Management and Monitoring).

And the planning statement states: *“The site is within 5km of the Thames Basin Heaths Special Protection Area (SPA). In this case contributions will be needed towards Suitable Alternative Natural Greenspace (SANG) as well as a financial contribution for ongoing monitoring (SAMM). The site lies adjacent to Rooks Nest Wood Country Park that is an 18.2 hectare Suitable Alternative Natural Greenspace (SANG) that was developed in 2011 to provide an informal recreation area for new and existing residents of the Borough. We await advice on whether a contribution can be made towards the maintenance of this existing provision. “*

Before the application can be determined you should seek confirmation that there is adequate SANG provision and that the appropriate SANG and SAMM contributions can be secured

Effect on wildlife during and after development

The Ecology report (Plan Ecology, January 2023) and GCN Survey Report (Plan Ecology, June 2023) are discussed below:

Habitats:

Habitats on site include hardstanding/buildings, amenity and improved grassland, ornamental planting, species poor hedgerows and scattered trees. None of these are priority habitats and their loss would not be a constraint to the proposals.

Great Crested Newts:

GCN receive protection under UK law, and it is a criminal offence under the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2010 (The Habitat Regulations), deliberately or recklessly to destroy or damage their habitats, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from the Statutory Nature Conservation Organisation (the SNCO - Natural England in England).

The application site is within the NatureSpace GCN District Licence (GCNDL) Red Zone which means that works are likely to affect GCN. Although, there are no ponds present on the site, surveys of three ponds within 250m of the site found none suitable for GCN. As such, the “Great Crested New eDNA Sampling” report concludes that GCN are unlikely to be affected by the development.

Nonetheless, and as per communication with NatureSpace (email dated 14/Aug/2023), it is recommended that a pre commencement condition is put in place requiring the provision of a

GCN precautionary working method statement. This should be secured via a planning condition to ensure no harm comes to GCN during the works and submitted and approved by the council, prior to construction - example wording is given below

Other protected species (eg bats, badgers, nesting birds, reptiles etc)

The report concludes that the development is unlikely to affect bats or reptiles. However, unmitigated, the proposals could have minor adverse ecological impacts on the following features:

- Nesting birds in trees and other vegetation.
- Badgers: while the report states that there are no setts on the site, the site is less than 150m from a main badger sett and the site is very likely to be used by foraging badgers. As such, the Construction Environmental Management Plan (CEMP) should include appropriate mitigation measures for badgers during and post-construction.

Should the application be approved, a condition should therefore be set to ensure that a Construction Environment Management Plan (CEMP) for Biodiversity is produced and implemented prior to works starting on site – example wording provided below

Lighting

Paragraph 198 of the NPPF (2024) states that planning decisions should limit the impact of light pollution from artificial light on nature conservation. The site is adjacent to woodland which is a priority habitat and is used by protected species. As such, external lighting would need to be restricted to prevent obtrusive light spill across the entire site but particularly along the woodland edge. A condition should be set to ensure that a wildlife friendly lighting scheme is provided. Example wording is given below.

Biodiversity Enhancements

In accordance with Paragraph 193 of the NPPF which states that “*opportunities to improve biodiversity in and around developments should be integrated as part of their design*”, it is recommended that a condition be set to ensure that enhancements for wildlife such as integral bat and bird boxes are provided within the new development. Suggested wording provided below.

Biodiversity Net gain (BNG)

The development is subject to mandatory BNG. The BNG report/technical note(AAe, Rev A, July 2025) concludes that the development will lead to an on site net gain of 0.69 Area Habitat Units (AHUs) equivalent to 15.55%.

One large and two medium trees will be removed. The net gain will be achieved through the planting of 64 small trees, creation of a large pond and areas of scrub across the site, and the enhancement of areas of modified grassland in poor condition to moderate condition.

Overall, these plans appear acceptable as long as the biodiversity enhancements are delivered on site. Given the nature of the proposed on site measures, these would be considered as ‘*significant on site enhancements*’ and therefore would need to be secured through a planning condition or obligation. This can be done through submission of a Biodiversity Net Gain plan plus a Habitat Management and Monitoring Plan (HMMP) – example conditions are provided below.

Summary:

Before the application can be determined you should seek confirmation that there is adequate SANG provision and that the appropriate SANG and SAMM contributions can be secured

As per advice from the NatureSpace partnership a condition should be set to ensure that a non licenced method statement for great crested newts is submitted to and approved in writing by the council.

Mitigation measures for other wildlife on or close to the site can be secured through the submission of a pre commencement CEMP

Proposed on site habitat enhancements for BNG would need to be secured through the submission of a BNG plan and HMMP to ensure these enhancements are provided.

Conditions & Reasons (if required)

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
 1. 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 minimise impacts on biodiversity in accordance with the NPPF and CP7 of the Core Strategy and TB23 of the MDD

Condition: No development shall commence until a Great Crested Newt precautionary working method statement is submitted to and approved in writing by the Local Planning Authority. The approved working method statement shall be abided by at all times thereafter.

Reason: To further reduce the risk of impacting Great Crested Newts should they be present in the area, in accordance with CP7 of the Core Strategy and TB23 of the MDD.

Condition: No development above slab level shall commence until a report detailing the external lighting scheme and how this will not adversely impact upon wildlife has been submitted to and approved in writing by the LPA. The report shall include the following figures and appendices:

- A layout plan with beam orientation
- A schedule of equipment

- Measures to avoid glare
- An isolux contour map showing light spillage to 1 lux.

The approved lighting plan shall thereafter be implemented as agreed.

Reason: To limit the impact of light pollution from artificial light on nature conservation (paragraph 198 of the NPPF)

Condition: Prior to the commencement of development, details of biodiversity enhancements, to include a scheme of integrated bird and bat tile/bricks/boxes built into each of the new buildings and native and wildlife friendly landscaping (including gaps at the bases of fences to allow hedgehogs to traverse through the gardens), shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved and prior to occupation of the development a letter report from a suitably qualified ecologist with photos of the nest bricks in situ shall be submitted to and approved in writing by the council.

Reason: To incorporate biodiversity in and around developments in accordance with paragraph 193 of the NPPF and CP7 of the Core Strategy and TB23 of the MDD

Biodiversity Net Gain

Prior to the commencement of the development hereby permitted, a biodiversity gain plan shall be submitted to and approved in writing by the Local Planning Authority.

The biodiversity gain plan must include:

- information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;
- the pre-development biodiversity value of the onsite habitat;
- the post-development biodiversity value of the onsite habitat;
- any registered offsite biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development;
- any biodiversity credits purchased for the development; and
- any such other matters as the Secretary of State may by regulations specify.

The Biodiversity Gain Plan shall be prepared in accordance with the BNG Statutory Metric dated 09 July 2025 and the Technical Note: Biodiversity Net Gain Rev A; Ref: 243388 dated July 2025 prepared by AA Environmental

The development shall not commence until a [Habitat Management and Monitoring Plan (the HMMP)], prepared in accordance with the approved Biodiversity Gain Plan and including:

- a non-technical summary;
 - the roles and responsibilities of the people or organisation(s) delivering the [HMMP];
 - the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
 - the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
 - the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority,
- a) has been submitted to, and approved in writing by, the local planning authority.

Notice in writing shall be given to the Council when the:

- [HMMP] has been implemented; and

(b) habitat creation and enhancement works as set out in the [HMMP] have been completed.

No works/development shall take place until:

- a) the habitat creation and enhancement works set out in the approved [HMMP] have been completed; and
- b) a completion report, evidencing the completed habitat enhancements, has been submitted to, and approved in writing by the Local Planning Authority.

The created and/or enhanced habitat specified in the approved [HMMP] shall be managed and maintained in accordance with the approved [HMMP].

Monitoring reports shall be submitted to local planning authority in writing in accordance with the methodology and frequency specified in the approved [HMMP].

Reason: To ensure the development delivers a biodiversity net gain on site in accordance with Schedule 7A of the Town and Country Planning Act 1990 and policy CP7.

Date:	22/7/2025	Signed:	C HOLWILL
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