

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	253071
Address:	Land To West Of Park Lane, Charvil, RG10 9TS.		
Proposal:	Application for approval of Reserved Matters pursuant to Outline Planning Consent 232704 comprising details of 75 homes, together with associated internal access roads, parking, public open space, landscaping and sustainable drainage systems (SuDS). Details of appearance, landscaping, layout and scale to be considered.		
Type of Development:	Major Dwellings (10+)		
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

Reports reviewed for this application

- Preliminary Ecological Appraisal Report, 2023 by Collington Winter Environmental
- Tree Protection Plan, 2025 by Aspect Arboriculture
- Preliminary Ecological Appraisal Report, 2025 by Pro Vision
- Reptile Mitigation Strategy, August 2023 by Collington Winter Environmental
- Biodiversity Net Gain Assessment, December 2025, Version 2 by Pro Vision

Updated reports reviewed:

- Biodiversity Net Gain Assessment, May 2026, Version 3.0 by Pro Vision
- Preliminary Ecological Appraisal Report, May 2026, Version 1.0 by Pro Vision

Revised plans following ecology comments dated 15/06/26

- Biodiversity Net Gain Assessment, July 2026, Version V.5 by Pro Vision
- Preliminary Ecological Appraisal Report, July 2026, Version 5.0 by Pro Vision

Biodiversity Net Gain

Previous ecology comments raised several concerns and queries which has now been addressed below (black text shows previous ecology comments and red text indicating new ecology comments).

- Appendix B (Baseline Habitats Map) of the Biodiversity Net Gain Report does not align with Appendix C (Habitats Survey Plan) of the Preliminary Ecological Appraisal (PEA), as the latter identifies the western boundary as lowland mixed deciduous woodland while the former shows it as ecologically valuable trees within modified grassland; given that the biodiversity metric baseline has not changed, the PEA confirms no habitat changes following the updated walkover, and the outline-stage baseline recorded the western boundary as linear trees only, it is recommended that Appendix C is revised to ensure consistency with Appendix B of the BNG Report.

Following previous ecology comments, the Biodiversity Net Gain report and Preliminary Ecological Appraisal now show the same baseline map.

- There is a post-intervention map within the metric, but this is not shown in the appendices of the BNG report. The intervention map shown in the metric, does not show the habitat key and makes it difficult to ascertain the location of habitats described within the metric. Can this be implemented into the BNG report to show the created habitats and the key.

There is now a post-intervention map with habitat key within the Biodiversity Net Gain Report.

- The post-intervention map must have all habitats must be clearly keyed across the plans. While it is acknowledged that certain areas (e.g. hardstanding, dwellings, and vegetated gardens) have not been illustrated in detail, these still need to be fully habitat-characterised. This is particularly important given that the scheme proposes trees within the frontages of houses; it must be clarified whether these are located within private vegetated gardens or within areas intended to be secured for BNG. If they fall within vegetated gardens, the trees cannot be reliably secured in accordance with the BNG User Guide, and the metric should therefore be updated to remove the 22 frontage trees currently included. Alternatively, if these trees are intended to function as screening and contribute to BNG, details must be provided on how they will be secured and managed long-term to prevent removal by future homeowners.

The revised BNG Assessment now indicates that proposed tree planting in the frontages of the house is to be categorised as vegetated garden and the trees no longer contribute towards the biodiversity net gain score of the development, thus adhering to Statutory metric guidance.

The revised landscape strategy now provides a wider buffer zone between the proposed development and the existing housing estate. The habitat proposed within this buffer comprises mixed scrub and is expected to achieve only a poor condition status. I agree with the applicant's ecologist that it is unlikely that a higher condition could be attained, given the practical limitations of accessing and managing the entire buffer area. These constraints are likely to restrict opportunities for ongoing habitat management and enhancement measures necessary to increase species diversity and overall habitat quality.

The submitted biodiversity metric does present a post-development scenario. While it is not appropriate at this stage to approve the detailed habitat proposals—particularly as the submission relies on off-site biodiversity units—a significant proportion of the onsite habitat units are attributed to the bioswale, attenuation basin created woodland, scrub and creation of individual trees, neutral grassland and

modified grassland. To ensure the proposed habitats are managed for 30 years, details of management and monitoring will need to be secured through a Habitat Management and Monitoring Plan (HMMP). I recommend a planning obligation is applied to secure monitoring of the proposed biodiversity on-site net gain measures as agreed in the HMMP.

A Biodiversity Gain Plan is required to discharge the statutory biodiversity net gain obligation under the Environment Act 2021. As on-site measures cannot deliver the required 10% net gain, the Gain Plan must confirm how off-site biodiversity units will be secured. Approval of this plan is necessary before development can commence.

As the habitats on site have not changed, the below information on protected species remains the same as the previous ecological memo.

Protected Species

The application ecologist has provided in depth mitigation measures to ensure protected species are not impacted by this development. However, there following protected species which require mitigation measures.

Bats

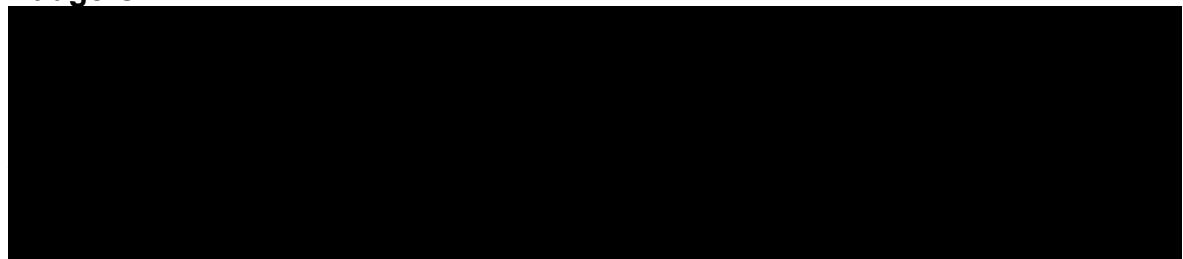
The applicant's ecologist identifies the site as having high potential for foraging bats, with the mature oak trees offering suitable roosting features. As all trees and associated habitat features are to be retained, no further bat activity or roost surveys are required at this stage and instead recommend mitigation measures have been proposed. These include sensitive lighting design in accordance with the Bat Conservation Trust's Guidance Note 08: *Bats and Artificial Lighting*.

While I support the mitigation measures outlined, further detail is still required in the form of a full lighting plan, as secured by Condition 42 at the outline stage. As this lighting plan has not yet been submitted, I propose that the measures identified within the PEA are incorporated into, and secured through, the outstanding lighting plan to ensure compliance with best practice and to safeguard bat habitat during the operational phase.

Reptiles

The site is recognised as Key reptile site due the presence of three reptile species. The PEA following reptile mitigation measures that are outlined in both the CEMP and the Herptile Mitigation Statement by Collington Winter in 2024 submitted and approved at outline stage and accept the PEA provides suitable mitigation strategy.

Badgers



Biodiversity Enhancement

The PEA proposes biodiversity enhancements including integrated bat and bird boxes and hedgehog highways, which are consistent with the measures identified at outline stage. Following previous ecology comments, the revised Preliminary Ecological Appraisal now includes the implementation of reptile hibernaculum and invertebrate hotels. These enhancements are now inline with what was recommended at outline permission.

The enhancements outlined in the PEA are welcomed, but an Ecological Permeability Plan is still required in accordance with Condition 43 from the outline consent.

Conditions & Reasons (if required)

A Habitat Management and Monitoring Plan (HMMP) (Updated version of a LEMP)

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.

Date:	23/07/26	Signed:	L.Aparo
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