

MEMORANDUM

From:	Duncan Fisher Ecology Officer		
Service	WBC Ecology	App No:	250517
Address:	Land Off Basingstoke Road, To the south and west of Spencers W.		
Proposal:	Hybrid planning application (part outline/ part detailed) comprising: Outline planning permission is sought with all matters reserved for future determination, save for the means of access via Basingstoke Road, for: up to 420 dwellings (Use Class C3), an 80 bed care home (Use Class C2), 1ha of employment land (Use Class E(g), primary school (Use Class F1), local centre (Use Classes E(a), (b), (c), (f)), GP Surgery (Use Class E(e), sports pitch and changing facility, public open space and a full application for the proposed Suitable Alternative Natural Greenspace (SANG), associated landscaping/car park.		
Type of Development:	Major 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

Thames Basin Heaths SPA

The application site is within 3.2km of the Thames Basin Heaths Special Protection Area (TBH SPA). The local road network connects the site to both Bramshill SSSI and Hazeley Heath SSSI, which are component parts of the TBH SPA. This development proposal has not been assessed as part of the air quality modelling for habitat regulations assessment of the Wokingham local plan update. It will therefore need to consider this pathway to likely significant effects on part of the national site network itself.

Section 4.3.1 of the submitted Ecological Impact Assessment (EclA) (RammSanderson, ref: RSE_7799_R1_V3_EclA, March 2025) refers to the submitted Air Quality Assessment paragraphs 3.16-3.18 for demonstrating that the proposal would not result in likely significant effects on the TBH SPA via the air pollution pathway.

Paragraphs 3.17 of the submitted Air Quality Assessment (BWB Consulting, ref: SWW-BWB-XX-ZZ-LA-RP-001_AQA, March 2025) refers to the Institute of Air Quality Management guidance - A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites (2020). There is no reference to the more recent guidance from the Joint Nature Conservation Committee (JNCC) – Main Report: Guidance on Decision-making Thresholds for Air Pollution (2021), which may be relevant for screening individual projects before getting to the in-combination assessment covered by the 1000 AADT or 1% increase threshold mentioned.

Paragraph 3.18 screens out the need for air quality assessment on the basis that the submitted Transport Assessment (Hub Transport Planning, ref: T23591 Rev B, February 2025) does not show any road within 200m of the TBH SPA as exceeding the cumulative threshold increase.

Reading the Transport Assessment, I cannot see any attempt to model the individual project or cumulative AADT change on any of the roads within 200m of the TBH SPA. There is no mention of the TBH SPA being part of the assessment. It is not clear how paragraph 3.18 of the Air Quality Assessment is justified.

On the current submission, I cannot recommend that the submitted information gives the certainty that there will not be likely significant effects (alone or in combination) on the Thames Basin Heaths Special Protection Area via the air quality pathway. Please can further information be submitted to explain how the traffic modelling does justify this pathway to be screened out from appropriate assessment (or otherwise supply further supporting information to allow the pathway to be considered at appropriate assessment).

Stanford End Mill and River Loddon SSSI

This proposal is within an impact risk zone for a SSSI where Natural England should be consulted. Natural England's advice as to the risk of likely significant effects on this site of national importance for biodiversity should be given greater weight than mine.

On the current evidence, I cannot see a pathway to harm to the SSSI provided the recommended pollution control measures are applied during construction. I therefore recommend inclusion of mitigation measures for Stanford End Mill and River Loddon SSSI is an item that must be covered in a Construction Environmental Management Plan (CEMP) Condition.

Irreplaceable Habitat

I note that in the Habitats Within Survey Area Table in the submitted EclA there is a reliance on the Arboricultural Assessment report to determine whether veteran or ancient trees are within the site.

Reading the submitted Arboricultural Baseline Note it appears that it did not consult the Ancient Tree Inventory which lists a number of trees on site as being veteran. I am concerned that trees T24, T30, T32, T60, T61, T76, G83, and T87 need further assessment work to consider whether they should be considered as veteran trees. In particular, the ecological assessment needs to consider the third pathway to being classified as veteran under the biodiversity net gain regulations definition of irreplaceable habitat – whether the tree supports rare species. This is made a more relevant pathway

to assess because the desktop survey has identified wood pasture and parkland priority habitat locally within 200m of the site boundary.

It will be important to resolve whether there is irreplaceable habitat on-site as parameters plans should provide adequate buffering to it and the biodiversity net gain baseline needs to recognise irreplaceable habitat on-site. Please can further information on this matter.

Biodiversity Net Gain

I have provided line by line comments on the submitted R1V3 iteration of the biodiversity net gain metric submitted. These focus on the baseline tabs (A1, B1, C1) relevant to agree prior to determination. I currently have the following concerns which it would be helpful to have further information on:

1. Any trees (as mentioned above) that are veteran will need to be included in the baseline as individual trees.
2. Of those individual trees already included in the baseline it would be helpful to have the relevant Arboricultural Baseline Note tree numbers identified. At the moment, I am concerned that not all relevant trees have been included or perhaps some of the trees have been given the wrong size category – for instance T76 in H12 is very large and not large. All the trees identified for removal in the Arboricultural Impact Assessment will need to be included as individual trees in the baseline.
3. It is not clear from the habitat descriptions whether the arable fields have been assessed for the presence of field margins. Are any arable field margins present? If so, can these be included in the baseline.
4. It appears as if a number of hedgerow lengths along the eastern boundary have not been included (or are listed as bramble scrub). The Arboricultural Baseline Note indicates that hedgerows H36-H40, H45-H53, H58 and H63 contain woody species and are not just bramble scrub.
5. The Drainage Strategy Note indicates that there is a surface water culvert across at least one field. This will need to be included within the baseline.

Whilst the post-development biodiversity net gain detail is a matter to be resolved by condition, should permission be granted, it is worth looking at the indicated strategy for delivery of the mandatory biodiversity net gain target. The proposal is seeking to deliver biodiversity net gain on-site and this includes through delivery of a significant number of units by creation or enhancement of medium (or higher) distinctiveness habitats. I therefore recommend that a Habitat Management and Monitoring Plan (HMMP) condition and a planning obligation securing implementation and monitoring of the site are applied, in order to be confident that delivery of the biodiversity net gain target is secured.

Bats

I can recommend that sufficient survey effort has been undertaken for the local planning authority to be able to assess the potential impact of this development on bats.

I note that five trees on-site have been assessed as having 'M' type potential roosting features. The current proposals seek to retain these trees. However, I am concerned that the Parameter Plan and Illustrative Landscape Masterplan show that these trees could well become fragmented and subject to artificial lighting associated with adjacent development. Whilst the mitigation strategy recommends strengthening the vegetation and wildlife corridor along the northern perimeter of the site, I am not convinced this is

achievable within the space that the Parameter Plan and Illustrative Landscape Masterplan allow. It would be helpful to have more detail as to how the PRF-M trees will remain connected to commuting and foraging corridors for bats.

I agree that the assemblage of bat species recorded on-site is not of county significance. The use of the northern perimeter of the site by Barbastelle bat is important, though. This species is classified as vulnerable in England under IUCN classification and it will be important to assess the impact of the proposals on the local conservation status of this species carefully. I agree that currently the site is likely only of interest to the species as a commuting route. This is a light sensitive species and vegetated boundary likely provides a dark corridor between parkland (to the West) and the river Loddon (to the East). The mitigation proposals are to strengthen the vegetated corridor along the northern boundary in order to retain a commuting corridor between the new development and the existing development to the North. I accept that this could be possible but I am concerned that the current Parameters Plan and Illustrative Landscape Masterplan do not show the space being reserved for this mitigation measure. It would be helpful to have an example cross section of how the wildlife corridor is proposed to be retained and enhanced at this stage to set the minimum standard when it comes to future detailed design at reserved matters.

The EcIA makes mitigation recommendations regarding lighting to minimise the impact on light sensitive species. I have reviewed the Lighting Strategy submitted and there are a number of mitigation measures taken forward and applied. I recommend that a lighting for light sensitive species condition is applied to secure the detail showing application of the mitigation measures when it comes to reserved matters.

I note that section 4.12 of the EcIA recommends the inclusion of bat boxes within the development. I agree that this is a measure that the local planning authority should seek to be included within the detailed design. I therefore recommend that detail and implementation of the measures listed in 4.12 should be secured by condition.

Considering the site as a whole, I am of the view that the proposed green infrastructure is likely to improve the foraging quality of the site for bats, including Barbastelle bat.

Provided that ecological permeability for bats, in particular for the key features identified on site already, is retained, I would be able to recommend that the proposal maintains (and potentially enhances) the local bat conservation status.

Birds

The EcIA reports that six confirmed and three probable breeding territories of Skylark were identified on-site during the breeding bird surveys. This is a ground nesting species that generally requires large open fields for successful breeding.

I agree with paragraph 4.8.2 v that it will not be possible to compensate for loss of breeding territories within the site in the post-development scenario. The loss of nine territories is a significant loss of local conservation status of a bird species of principal importance, contrary to local plan policies CP7 and TB23.

The local planning authority has accepted off-site compensation – through appropriate new management practices secured in viable locations elsewhere in the borough – for other planning applications that have had a similar adverse impact on Skylarks.

At the moment, there is no requirement for the local planning authority to deliver a compensation programme for this species, funded by developer contributions. It would be for the applicant to demonstrate a viable compensation scheme to satisfy local plan policy CP7. If a viable compensation programme to provide 18 Skylark plots for the operational lifespan can be identified by the applicant and appropriately secured (usually via a planning obligation) then I would be able to recommend that locally favourable conservation status of this species can be maintained and the proposal complies with local plan policies CP7 and TB23 for this species of principal importance.

Please could the applicant supply an outline Skylark compensation strategy prior to determination, including covering the mechanism by which it is to be secured, prior to determination.

Badgers

I am in agreement that the current survey evidence indicates that the development design would not be harmful to a local Badger sett. It is appropriate to allow for local fluctuations in use of the site by Badgers through application of the mitigation measures outlined in 4.10.1 of the EclA. I recommend that the detail and implementation of these measures is secured within a CEMP condition.

Species Enhancement Measures

It is appropriate for the local planning authority to seek species specific enhancement measures under both local plan policy TB23 and NPPF paragraph 187(d). Proposed enhancement measures are given in section 4.12 of the EclA – although this list also includes mitigation measures for ecological permeability (hedgehogs) and entrapment/mortality (amphibians) which aren't strictly enhancement.

The measures are appropriate, if lacking in detail. However, I accept that the detail of type, number, and locations and implementation could be secured by an appropriately worded condition. At this stage, I would expect that there should be a minimum of 450 bat or bird boxes integrated within the built form of a development of this size.

Summary

I have requested further information on a number of ecological matters. This is to help provide the clarity the baseline ecological position, how the proposal is compliant with local policies for protected species and species of principal importance, and the relevant information to support appropriate assessment.

This response recommends a number of conditions (and, potentially, planning obligations) which are required to make the proposal ecologically acceptable. It may be that the further information requested raises the need for other conditions or obligations to make the proposal acceptable. For those that have already been recommended, indicative condition wording is referenced below.

Conditions & Reasons (if required)

Construction Environmental Management Plan (CEMP)

As per British Standard 42020:2013 standard condition D.4.1 unless a CEMP condition is required for another specialist reason, in which case they will need to be synthesised to create a single condition to cover both disciplines.

Lighting for Light Sensitive Species

As per British Standard 42020:2013 standard condition D.3.5

Species Specific Enhancements

Condition: *Prior to commencement, a strategy for ecological permeability and biodiversity enhancements to the site, in line with those listed in section 4.12 of the submitted Ecological Impact Assessment (RammSanderson, ref: RSE_7799_R1_V3_EclA, March 2025), shall be submitted to the local authority for its approval. Once approved the strategy shall be implemented in full unless otherwise agreed by the local authority in writing.*

Reason: *to ensure that the proposal is in accordance local plan policies CP7 and TB23 and the National Planning Policy Framework which requires consideration of the potential biodiversity gains that can be secured within developments.*

Soft Landscaping

As per standard condition wording CL5

Habitat Management and Monitoring Plan (HMMP)

As per British Standard 42020:2013 standard condition D.4.5 but adapted to reference the BNG objective and revised title of HMMP rather than LEMP.

Date:	7 July 2025	Signed:	D. Fisher
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