

MEMORANDUM

From:	Duncan Fisher Ecology Officer		
Service	WBC Ecology	App No:	251486
Address:	Land west of Edney's Hill, Barkham Road, Barkham.		
Proposal:	Full application for the proposed erection of 16 no. dwellings with new access off Edney's Hill, plus footpaths, car ports, parking, landscaping and associated works.		
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

The application is supported by an Ecological Appraisal (Essential Ecology, ref: ESEC/24084/01/v1.0, April 2025) and a separate Biodiversity Gain Statement (Essential Ecology, ref: ESEC/24084/02/v1.0, April 2025) and accompanying Statutory Metric (Iteration: v1.0, completed 7 April 2025). I have reviewed these and have the following comments:

Biodiversity Net Gain

I line by line comment has been given in a LPA comment copy of iteration v1.0 of the Statutory Metric. I can recommend that the habitat types, condition scores and areas listed in the baseline tabs A1 and B1 can be agreed. I am concerned that T20 has not been included in the A1 tab. Although both the Ecological Appraisal and Arboricultural Impact Assessment try to claim it is off-site, the red line boundary is drawn through the stem in plans and I therefore think it does need to be included.

I also recommend that it is a size to be considered as a veteran tree and irreplaceable habitat. The BNG Irreplaceable Habitat Regulations allowing for any one of three pathways (size, condition, supporting rare species) being used to recognise a veteran tree. Considering condition, it is relevant to note that the Arboricultural Impact Assessment (Aspect Arboriculture, ref: 12357_AIA.001, April 2025) makes the following observations:

*“Several previous failure wounds throughout crown
Above average deadwood*

Cavities within buttress on southern aspect of base”

Which also indicate that it may also qualify as veteran under the condition pathway. It does not appear to have been surveyed specifically for rare species so this pathway cannot be excluded either.

If T20 is included within the baseline assessment of the BNG Statutory Metric, I would be able to recommend that the local planning authority can agree the baseline.

I note that a detailed assessment of the post-development scenario is included within v1.0 of the submitted metric. Agreement/approval of this post-development part of the metric would need to be via condition discharge, should permission be granted. I have therefore not provided a detailed review of these tabs. However, I note that does rely on creation and enhancement of medium distinctiveness habitats on-site. I therefore recommend, should permission be granted, that a condition is applied to secure a detailed Habitat Management and Monitoring Plan (HMMP) and a planning obligation is agreed to secure delivery and monitoring of the HMMP including covering the local planning authority's monitoring costs.

Irreplaceable Habitat – T20

On the basis that tree, T20, is actually a veteran tree, the proposed layout does not provide a large enough buffer zone for this tree. Although this is primarily a matter that Trees and Landscape specialist officers will advise on, until such time as the proposal is redesigned to remove development from the veteran tree buffer zone, the proposal is contrary to local plan policies CP7 and TB23.

Protected Species

Bats

In the Ecological Appraisal, the desktop survey has identified a number of bat species as being recorded locally. Our records indicate that some of the nearby bat records are of local bat roosts. Despite the desktop survey results, the site itself has not been subject to a bat activity survey. In the absence of survey effort demonstrating otherwise, I recommend that the planning authority has to proceed on the basis that the site does provide foraging and commuting interest for bats.

Considering the proposed layout, I am inclined to agree with the applicant's ecologist that the main commuting routes for bats can be retained in the course of the development provided that an appropriate lighting for light sensitive species strategy is secured and implemented. I therefore recommend that a condition is applied to secure a lighting for light sensitive species strategy, as per the British Standard 42020:2013.

Badger

No Badger setts have been identified on or immediately adjacent to the site. The use of the site for foraging by Badgers cannot be ruled out. On this basis, mitigation measures are proposed during construction that are relevant to Badgers. If these mitigation measures are secured I can recommend that the proposal will be unlikely to harm a Badger. As mitigation measures are recommended for a number of species and these also need to be framed within the timescales and other constraints of the construction programme, I recommend that detailed protected

species mitigation measures are secured via a Construction Environmental Management Plan (CEMP) condition and this will ensure that they are appropriately synthesised into the site specific construction plan.

Birds

Although the desktop survey has identified local records of Skylark, I can recommend that the size of the site and surrounding mature tree and hedge habitat means that it is unlikely that this species is nesting on site. I can recommend that the proposal is unlikely to have a detrimental impact on the local conservation status of a bird species of principal importance.

Reptiles

The Ecological Appraisal has not conducted a presence / likely absence survey for the site. It does pick up that widespread reptile species are recorded relatively locally and that the perimeter of the site does provide some suitable reptile habitat. I recommend that, in the absence of survey effort demonstrating likely absence, the local planning must proceed on the basis that reptiles are present on site.

I agree that the layout proposed can retain most of the suitable habitat for widespread reptiles on-site – provided management for reptiles is included as an objective in a Habitat Management and Monitoring Plan (HMMP) for the open spaces on-site.

If reptile mitigation during construction is secured via a CEMP condition and ongoing management for reptiles secured via a HMMP, I would be able to recommend that the proposal is capable of maintaining the local conservation status of reptile species of principal importance.

Species Specific Enhancements and Ecological Permeability

Section 7.2 of the submitted Ecological Appraisal makes recommendations for ecological permeability measures and species specific enhancements. Local plan policy TB23 sets out a requirement for new development to provide enhancement and ecological permeability. It is therefore appropriate to secure these measures. Currently the measures are not set out in detail. I therefore recommend a condition to resolve the detail and implement the enhancements and ecological permeability measures as approved.

Thames Basin Heaths SPA

The application site is within 5km of the Thames Basin Heaths Special Protection Area (TBH SPA) and therefore is screened in for likely significant effects on the TBH SPA via the recreational pathway for net new dwellings.

The submitted Ecological Appraisal proposed to secure mitigation for likely significant effects on the TBH SPA as per the standard delivery framework of providing SANG and SAMM. It proposes to secure SANG capacity at Rooks Nest Wood via a contribution secured by planning obligation. The site is within the catchment of Rooks Nest Wood SANG. Should the Council not wish to supply SANG capacity from Rooks Nest Wood SANG, another strategic SANG will need to be identified and the applicant will need to show that this meets the standards required for it to be viable SANG for this site.

In the absence of planning obligations securing both SANG and SAMM for this site, the proposal does not pass appropriate assessment and must be refused, as per local plan policy CP8 and the Habitat Regulations 2017 (as amended).

Summary

If further information can be provided to:

- Resolve the baseline biodiversity net gain detail,
- Show a layout that provides an appropriate buffer zone to the veteran tree, T20, and
- The recommended condition wording (with reference to British Standard wording) as given below are applied

I would be able to recommend that the proposal is compliant with the biodiversity net gain regulations and local plan policies CP7 and TB23.

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 section 7.2 of the submitted Ecological Appraisal (Essential Ecology, ref: ESEC/24084/01/v1.0, April 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.*

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:	8 October 2025	Signed:	D. Fisher
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