

Date: 27 March 2026
Application: 260425



**WOKINGHAM
BOROUGH COUNCIL**

WBC Ecology

Development Management &
Compliance

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MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	260425
Address:	St Paul's C Of E Junior School, Oxford Road, Wokingham, RG41 2YJ.		
Proposal:	Full Application for the proposed single storey SEND resource base and associated landscaping.		
Type of Development:	Minor 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

Documents reviewed:

Documents submitted and reviewed in support of this application:

- Biodiversity Net Gain Calculation, 16th February 2026, Revision v.2 by Jomas, Engineers Environmental Land Remediation.
- Ecological Assessment, 16th February 2026, Revision v.2 by Jomas, Engineers Environmental Land Remediation.

- Statutory Metric Tool, 19th May 2026, Calculation iteration 2.0 by Matthew Stephenson on behalf of by Jomas, Engineers Environmental Land Remediation.

Biodiversity Net Gain

To comply with the Environment Act 2021, all developments, with some exceptions, are obligated to achieve a 10% net gain in biodiversity.

To demonstrate this development can comply with the Environment Act 2021, the applicant's ecologist has submitted a Biodiversity Net Gain Assessment. I agree with the baseline conditions submitted within the BNG metric.

The submitted biodiversity metric does present a post-development scenario. While it is not appropriate at this stage to approve the detailed habitat proposals as it's a pre-commencement condition, the proposal relies on on-site habitat creation of tree planting to achieve a 13.80%. 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).

Protected Species

An ecological Assessment was submitted to indicate any impacts on protected or priority species and habitats. The location of the proposed development consists of hardstanding and heavily managed modified grassland and a willow tree.

The Ecological assessment indicates the following impacts to protected species;

Badgers

The applicant ecologist recorded four mammal holes, three of which appeared particularly used and one disused 50m north of the application site. There were no other signs of fresh use of sett, and the sett is considered an outliner set.

The applicant ecologist suggests that the presence of badgers outside of the redline boundary will not be impacted by the small development, however an updated badger walk should be conducted one month prior to works to ensure no active setts have been found closer to the development and to assess if the current setts are active and provide appropriate mitigation measures if so. I agree with the application ecologist and recommend securing an appropriate badger condition to ensure the species remains unharmed by the development to comply with the Convention of the Conservation of European Wildlife and Natural Habitats, Wildlife and Countryside Act 1981 and the Protection of Badgers Act 1992.

Breeding 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 PEA Report proposes that a willow tree will require removal to enable the development.

The Application ecologist has recommended standard best practice precautionary mitigation measures to ensure nesting birds are not impacted. These measures include works to take place outside of nesting bird season (March-September) or for an ecologist to check the habitat 24hour before removal for nesting birds. I agree

with mitigation measures, to ensure these measures are adhered to I recommend Protection of Breeding bird's condition.

Foraging and Commuting Bats

The site is surrounded by linear treeline which includes a veteran tree and a woodland patch to the north – northwest of the development. Bats have been recorded within 1km of the development, latest record in 2020. There is a Local Wildlife Site (Woosehill Meadows) that includes veteran trees, 100m northwest of the development, the treeline acts a connecting corridor between the LWS and a railway line to the east. As such, it is likely that bats utilise the treeline as a commuting and foraging corridor. There is potential for roosting features to be present within these trees as they have not been assessed, although no direct impacts are likely due the size and scale of the development.

All bats and their roosts are legally protected by national and European legislation including Wildlife and Countryside Act 1981 and Conservation of Habitats and Species Regulations 2017. Additionally, several species of bats are a priority species under the NERC Act 2016. These legislations make it illegal to deliberately disturb a bay, capture/kill or injure a bat or disturb a breeding or resting site.

Given the location of the proposed development a sensitive lighting plan will be required. The height of the building, when combined with integrated lighting positions has the potential to illuminate a larger area. This could disrupt the northern boundary commuting corridors and negatively impact light-sensitive species. These areas are likely to support a range of nocturnal and diurnal European Protected Species, such as bats and badgers, as well as species of principal importance including certain invertebrates and hedgehogs. The lighting plan should therefore maintain a dark corridor along the western edge of the site and adjacent treelines to minimise ecological disturbance.

The sensitive Lighting Plan should detail the location, type, and specification of all proposed lighting. This plan should follow the *Bat Conservation Trust Guidance Note 08: Bats and Artificial Lighting*. It is recommended that a Lighting Design Strategy for Light-Sensitive Biodiversity condition be required to secure details of the lighting plan.

Bats and their roosts are protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. Several species are also listed as Priority Species under the NERC Act. It is an offence to kill, injure, capture, or disturb bats, or to damage or obstruct access to their roosts.

The site is bordered by a treeline that includes a veteran tree and a woodland patch to the north–northwest. Approximately 100m northwest lies Woosehill Meadows Local Wildlife Site, which also supports Lowland Mixed Deciduous Woodland and veteran trees. Bats have been recorded within 1 km of the site, most recently in 2020 as such it's likely the treeline serves as a key ecological corridor linking the LWS to the railway line to the east.

Due to the site's proximity to sensitive habitats, a carefully designed lighting scheme is required. The proposed building height, combined with integrated lighting, has the

potential to increase light spill and affect the northern boundary corridor used by commuting bats and other light-sensitive species. These habitats may also support badgers, invertebrates, and hedgehogs.

To minimise disturbance, a dark corridor should be maintained along the western site boundary and adjacent treelines. A Lighting Plan should be prepared detailing the location, type, and specification of all lighting, in accordance with Bat Conservation Trust Guidance Note 08: *Bats and Artificial Lighting*. A planning condition securing a Lighting Design Strategy for Light-Sensitive Biodiversity is therefore recommended.

Great crested newts

The site includes a pond on site, as such a Habitat Suitability Index Survey for great crested newts has been undertaken, in which the result indicated that works are 'likely' to impact great crested newts. However, the applicant ecologist argues as there are no other waterbodies within 500m of the development and the only habitats present on site are regularly managed modified grassland, with a high footfall and hardstanding, it's unlikely that newts are present on site. I agree with this assessment and agree that great crested newts are unlikely to be on site or impacted by this development.

Biodiversity Enhancements

Chapter 15 of the National Planning Policy Framework (NPPF) and the Wokingham Borough Development Plan require development proposals to deliver measurable biodiversity benefits through building layout, design, or landscaping.

In order to comply with national and local policy, the applicant's ecologist has recommended the incorporation of bat, bird, and bee bricks within the fabric of the proposed dwelling. As no specific quantities have been set out, it is considered reasonable and proportionate to require the installation of one bat brick, one bird brick, and one bee brick within the new building. To ensure delivery of these biodiversity enhancements, it is recommended that a Species Compensation and Enhancement condition is attached to any grant of planning permission.

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 target

Lighting design strategy for light-sensitive biodiversity – Condition

Prior to occupation, a “lighting design strategy for biodiversity” for buildings, features or areas to be lit 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 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 policy compliance with national legislation Wildlife and Countryside Act 1981, Conservation of Habitats and Species Regulations 2017 and Wokingham Core Strategy, Policy CP7.

Protection of Breeding Birds During Construction Condition

No removal, planting or impact of hedgerows and trees shall take place between 1st March and 31st August inclusive, unless a competent ecologist has undertaken a careful, detailed check of vegetation for active birds’ nests immediately before the vegetation is cleared and provided written confirmation that no birds will be harmed and/or that there are appropriate measures in place to protect nesting bird interest on site. Any such written confirmation should be submitted to the local planning authority.

Reason: To ensure this protected species is not impacted by the development and in keeping with national legislation Countryside and Wildlife Act 1981.

Protection of Badgers Condition

As close as practicable and no earlier than three months prior to commencement of development, an additional badger survey report shall be submitted to and approved in writing by the Local Planning Authority. Should the position, in so far as it relates to badgers, have changed from that originally reported when the application was submitted, the new survey report should incorporate a revised badger mitigation plan.

Reason: To ensure the protection of badgers in compliance with the Protection of Badgers Act 1992 and Schedule 6 of the Wildlife and Countryside Act 1981 (as amended)

Species Compensation and Enhancement Condition

Condition: Prior to construction, a scheme for ecological permeability and biodiversity compensation and enhancement, such as the incorporation of one permanent bat roosting feature, one bird box and one pollinator bee brick, 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.

Date:	19/05/26	Signed:	L.Aparo
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