Hilltop Yard
Crest Close
Ruscombe
Reading
Berkshire
RG10 9BQ

Preliminary Ecological Appraisal

Report ref.: R504_PEA_a

Report Quality Control Information	
Author	*John Wenman MCIEEM*

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1 Diesel House, Honey Hill, Wokingham, Berkshire RG40 3BL
Telephone: 0118 327 1810 Mobile: 07979 403099 E-mail: info@wenman-ecology.co.uk
www.wenman-ecology.co.uk

1 EXECUTIVE SUMMARY

1.1.1 John Wenman Ecological Consultancy LLP was instructed ET Planning on behalf of Charlie Hurlock to undertake a Preliminary Ecological Appraisal (PEA) including a Preliminary Roost Assessment (PRA) of the buildings at Hilltop Yard, in Twyford, Berkshire. The PEA was commissioned to accompany a planning application to be submitted to Wokingham Borough Council seeking consent to replace the commercial buildings with a residential property.

1.1.2 The desk study (including a Thames Valley Environmental Records Centre (TVERC) 1 kilometre data search) revealed that the application site is not statutorily or non-statutorily designated for its wildlife interest and has no protected/notable species records. John Wenman MCIEEM carried out a site survey on June 5th 2025.

1.1.3 The application site comprised a 0.03ha commercial plot. The site is in a suburban setting surrounded by residential properties and their associated gardens. The site was primarily built development of negligible ecological value. The site is unlikely to support protected and notable fauna such as amphibians, birds, mammals and reptiles, but there is low residual risk that they could be found on site precautions are set out.

1.1.4 The buildings showed no evidence of the presence of bats and are unlikely to support roosting bats and therefore the proposals are unlikely to affect bats or their roosts.

1.1.5 The following recommendations have been made:

- Precautions for amphibians and small mammals during building work;
- Precautions for nesting birds; and;
- Biodiversity enhancement measures such as the use of native plants of UK provenance and installation of bat and bird boxes.

2 INTRODUCTION

2.1 Project Background

2.1.1 John Wenman Ecological Consultancy LLP was instructed by ET Planning on behalf of Charlie Hurlock a Preliminary Ecological Appraisal (PEA) including a Preliminary Roost Assessment (PRA) of the buildings at Hilltop Yard in Twyford, Berkshire.

2.1.2 The PEA was commissioned to accompany a planning application to be submitted to Wokingham Borough Council seeking consent to replace the commercial buildings with a residential property.

2.2 Site Location and Context

2.2.1 The buildings are situated just off Crest Close in Ruscombe near Twyford, Berkshire (SU 791 767).

2.2.2 The buildings are surrounded by residential properties on all sides. The local area is residential with the nearest 'open space' 80 metres to the south, which comprises a school playing field. Open agricultural fields are situated 180 metres to the north east and provide limited foraging habitat for bats.

2.3 Report Objectives

2.3.1 The aim of this PEA is to understand the nature of the site and assess its ecological value. The key objectives are to:

- identify any likely ecological constraints associated with the planning proposals;
- establish appropriate mitigation measures in accordance with the mitigation hierarchy (i.e. avoid > mitigate > compensate);
- determine any additional surveys that may be required following on from this preliminary stage; and
- recognise opportunities to deliver ecological enhancements in line with national and local planning policy.

3 LEGISLATIVE BACKGROUND

3.1 Relevant Legislation

3.1.1 The following legislation is considered relevant for the purpose of this Preliminary Ecological Appraisal (PEA):

- Wildlife and Countryside Act (W&CA) 1981 (as amended)
- Conservation of Habitats and Species Regulations ('Habitat') Regulations 2017
- Countryside and Rights of Way (CRoW) Act 2000
- Natural Environment and Rural Communities (NERC) Act 2006
- [redacted]
- Wild Mammals (Protection) Act 1996

3.1.2 These acts hold relevance to both protected and invasive species and the degree of protection varies depending on faunal/floral group or species. For example, some species of European importance receive full protection in England and Wales under the Habitat Regulations (e.g. bats), whereas others may only be afforded protection through national legislation such as the W&CA 1981 (as amended) (e.g. common lizard). For a detailed overview of species-specific legislation, please refer to **Appendix 1**.

3.2 European Protected Species Mitigation Licensing

3.2.1 The Government's statutory nature conservation advisory organisation, Natural England, is responsible for issuing European Protected Species (EPS) mitigation licences that permit activities that would otherwise lead to an infringement of the Habitat Regulations. An EPS mitigation licence can be issued if the following three tests derived from Regulation 55 have been satisfied:

- (2)(e) – the derogation is for the purposes of '*preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment.*'

- (9)(a) – there is '*no satisfactory alternative*' to the derogation; and

- (9)(b) – '*the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range*.'

3.2.2 Local Planning Authorities (LPAs) have a statutory duty under Regulation 7(3)(e) of the Habitat Regulations consider and determine whether these three tests are likely to be

satisfied by planning proposals affected EPS before granted planning permission. If an EPS mitigation licence is necessary, a licence can be sought once all the necessary planning consents have been granted. Natural England aims to issue a decision on licence applications within 30 working days of submission.

4 PLANNING POLICY

4.1 National Planning Policy

4.1.1 The biodiversity duty imposed through the Environment Act 2021 states that Local Planning Authorities (LPAs) must consider what action they can take to conserve and enhance biodiversity in England.

4.1.2 The ODPM Circular 06/2005 provides guidance on the application of the law relating to planning and nature conservation in England, stating that '*the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat*.'

4.1.3 The revised National Planning Policy Framework (NPPF), published in December 2024, sets out the Government's planning policies for England and how they should be applied. Section 15 of the NPPF sets out the approach local authorities should adopt to conserve and enhancing the natural environment when preparing planning policy and when considering planning applications. Paragraph 193 sets out the principles LPAs should apply when determining planning applications, as follows:

'When determining planning applications, local planning authorities should apply the following principles:

a) if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

b) development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;

c) development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and

d) development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around

developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.'

4.1.4 In England, BNG became mandatory for major development from the 12th February 2024 and for minor development (small sites) from the 2nd April 2024 under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). In practice, planning permission in England is now subject to a condition to secure a minimum 10% net gain for biodiversity, unless the development is a type that is exempt from mandatory BNG requirements.

4.2 Local Planning Policy

4.2.1 Wokingham Borough Council currently has in place a Core Strategy Development Plan Document (DPD), adopted in January 2010. The Core Strategy DPD sets out the long term 'spatial vision' for the Wokingham Borough up until March 2026.

4.2.2 Work is underway on the new Local Plan Update document which will refine the current Core Strategy and Managing Development Delivery local plans for the borough up to 2040.

4.2.3 When considering planning applications, it is the local authority's obligation to consider the impacts of the development on protected species as set out in the NPPF and the OPDM Circular 06/2005.

4.2.4 The Strategic Flood Risk Assessment (SFRA) is a strategic document which identifies zones of risk to help in the allocation of land for development, for Development Management decision making purposes. Policy CP7 of the Core Strategy DPD provides guidance on how biodiversity should be considered as part of development. The Policy states: '*Sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance. Development:*

Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly, or

Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly, or

That compromises the implementation of the national, regional, county and local biodiversity action plans will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and:

Mitigation measures can be put in place to prevent damaging impacts;

or Appropriate compensation measures to offset the scale and kind of losses are provided.'

4.2.5 Policy CP8 of Wokingham Borough Council's Core Strategy DPD provides guidance on the avoidance and mitigation measures required for any net gain in residential development within 7km of the Thames Basin Heath SPA. The Policy states: *'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 Appropriate Assessment indicates that to ensure that development avoids its likely significant impact upon the SPA, the following principles will apply:

i) Dwelling houses and other residential development (including staff accommodation in use class C2) will need to provide avoidance and mitigation measures where:

a. The proposal involves the provision of one or more net additional residential unit and is within 5km (linear) of the SPA. Contributions to on site SPA access management measures and monitoring in line with the Delivery Framework will be required together with provision of SANG at a minimum of 8ha/1,000 population (calculated at a rate of 2.4 persons per household). This monitoring includes the effectiveness of the SANG;

b. The proposal provides 50 or more residential units within 7km (linear). In this case, the proposal will be individually assessed for whether a significant effect upon the SPA is likely either on its own or in combination with other plans or projects around the site. Where avoidance and mitigation measures are required to address likely significant effects, this is likely to involve SANG together with funding towards monitoring the effectiveness of the solution agreed;

c. There is a 400m exclusion zone from the SPA for any net additional dwellings due to the inability to avoid likely significant effects upon the SPA.

ii) SANG to be provided and maintained in perpetuity in line with the quality and quantity standards advocated by Natural England. The size and location of SANG contributes towards the delivery of healthy communities in line with advice from the Department of Health and NICE. In order to ensure access to avoidance sites in perpetuity, the Council's preference is for the authority to own any SANG. Where SANG also meets the definition of open space (see Appendix 4), it can also count towards this provision i.e. at least 1 ha/1,000 of the SANG could also contribute towards the Natural Greenspace requirement and vice versa; and

iii) Non-residential development will be individually assessed for their likely significant effects. Where avoidance and mitigation measures are required, monitoring of their effectiveness will be necessary.'

5 SURVEY METHODOLOGY

5.1 Desk Study

5.1.1 Thames Valley Environmental Records Centre (TVERC) was commissioned to undertake a search of pre-existing records of protected and/or notable species and non-statutorily designated wildlife sites held by them within a 1km radius around a central point inside the site.

5.1.2 The DEFRA Data Services Platform was used to obtain geospatial datasets for designated sites (i.e. RAMSAR, SPA, SAC, SSSI) and important habitats (i.e. Priority Habitat Inventory, Ancient Woodland Inventory) to be analysed in QGIS. The Multi-Agency Geographical Information Centre (MAGIC) website was examined for granted European Protected Species (EPS) licence applications. These geospatial datasets and Google Earth satellite imagery were used to determine the extent and connectivity of habitats, how the site is linked to the surrounding landscape and whether the development could have wider scale impacts on biodiversity.

5.1.3 Historical OS maps and Google Earth satellite imagery were consulted to provide insight into historic and current land use; such information helps contextualise the continuity of habitats and determine the importance of existing ecological features on site.

5.1.4 The type of soil on site was inferred using geological information taken from the British Geological Survey and on-site interpretation.

5.2 Field Survey

UK Habitat Classification Survey

5.2.1 A site walkover was undertaken on June 5th 2025 by John Wenman MCIEEM. The site was surveyed with reference to the UK Habitat Classification (UKHab) system (UKHab Ltd 2023) in accordance with the Guidelines for Preliminary Ecological Appraisal (2nd Edition) (CIEEM 2017). Particular attention was given to evidence of protected and priority species (NERC Act 2006 Section 41 species of principal importance) and the site's potential to support such species.

5.2.2 There were no significant survey constraints because full access was available to the site. The survey was subject to seasonal constraints because not all plant and animal species are visible throughout the year and therefore the report represents a snapshot of the site at the time of the survey only.

Preliminary Roost Assessment

5.2.3 A detailed inspection of the interior and exterior of the office buildings and exterior of the shed was undertaken June 5th 2025 by John Wenman MCIEEM (CL18 registration no.: CL18 2016-23859-CLS-CLS) in accordance with good practice guidelines (Collins 2023). The equipment used during the inspection comprised a high-power (1 million candlepower) LED torch and a headtorch. The inspection involved a systematic search of the exterior and interior of the structure during daylight hours to compile information on potential and actual bat access points; potential and actual bat roost sites; and any evidence of bat presence.

5.2.4 There were no significant survey limitations because PRAs can be carried out at any time of year under any weather conditions and the building was fully accessible.

5.2.5 It should be noted that it is not always possible to inspect all potential roost sites during a survey, particularly for bat species which typically roost in hidden crevices. Therefore, an absence of bat evidence found during a survey does not necessarily equate to evidence of bat absence in a building.

5.3 Report Validity

5.3.1 This report contains information regarding mobile species so it will likely be valid for up to 12 months only (CIEEM 2019).

6 DESK STUDY FINDINGS

6.1 Designated Sites and Habitats

6.1.1 The desk study returned no internationally designated or nationally designated statutory sites within a 2km radius of the application site and no internationally designated sites i.e. Special Protection Areas (SPA) and Special Areas of Conservation (SAC) within a 10km radius. There are three non-statutorily designated sites of local importance (SINCs) within a 1km radius – see **Tables 1** below.

Table 1. Non-statutorily designated sites within the vicinity of the site (Source: TVERC).

Site name	Designation	Description	Distance from nearest site boundary (m)
Ruscombe Village Pond	Local Wildlife Site (LWS)	This pond supports populations of great crest newt and common newt.	670m
Ruscombe & Vale Woods	Local Wildlife Site (LWS)	Ruscombe Wood is an area of largely ash dominated woodland with areas of hazel coppice without standard trees. English elm is abundant in places. There is a small area of Scot's pine plantation. Bluebell is often dominant in the ground flora. Lesser celandine and ground ivy are frequent in places. Common nettle dominates some areas. The wood has patches of early purple orchid and twayblade. Other species associated with long established woodland found here include three nerved sandwort and goldilocks buttercup. The site has wet depressions probably resulting from quarrying in the past. One is dominated by willows and the other supports greater pond sedge swamp with willows at the edge. To the west the site includes a pond and an area of rough grassland. Vale Wood hasn't been surveyed for many years and consists of ash woodland with some hazel coppice.	758m
Loddon River (part)	Local Wildlife Site (LWS)	A seventeen kilometre stretch of the River Loddon running from Swallowfield to its confluence with the River Thames near Wargrave. This section of the river has a diversity of features such as adjacent marsh, islands, inlets, riffles, river cliffs and extensive and varied channel vegetation. This includes the uncommon Loddon Pondweed *Potamogeton nodosus*. Water vole and a variety of dragonflies and damselflies are also found along its length.	846m

6.1.2 The application site contains no irreplaceable habitats (e.g. Ancient Semi-natural Woodland) or land mapped as a priority habitat.

6.2 Protected and Notable Species

6.2.1 The search of the TVERC database revealed a range of protected and notable species records within the last 10 years. Records relating to protected and notable species are detailed below (see **Tables 3a** & **3b**).

Table 3a. Recent protected and/or notable species records within the vicinity of the site (Source: TVERC).

Common name	Scientific name	No. of records	Most recent record	Nearest record (m)	Precision (m)	Status
Amphibians & Reptiles						
Common toad	*Bufo bufo*	1	2017	810	10	NERC_s41 WCA s5s91t
Grass snake	*Natrix helvetica*	4	2020	793	1	NERC_s41 WCA_5s91t
Great crested newt	*Great Crested Newt*	2	2017	793	10	NERC_s41 HDir4, HDir2 WCA5
Birds (Red list, Annex 1, Priority Species & Schedule 1 species)						
Bullfinch	*Pyrrhula pyrrhula*	19	2023	793	100	NERC-S41
Cetti's Warbler	*Cettia cetti*	33	2023	1000	100	WACA-Sch1-p1
Common Tern	*Sterna hirundo*	33	2023	1000	100	BirdsDir-A1
Cuckoo	*Cuculus canorus*	7	2020	1000	1000	NERC-S41 Red List
Dunnock	*Prunella modularis*	102	2020	1000	1000	NERC_s41
Fieldfare	*Turdus pilaris*	33	2020	817	100	WACA-Sch1-p1
Firecrest	*Regulus ignicapilla*	2	2017	1000	1000	BirdsDir-A1 WCA1
Golden Plover	*Pluvialis apricaria*	1	2016	1000	1000	BirdsDir-A1 WCA1
Goldeneye	*Bucephala clangula*	2	2017	1000	1000	BirdsDir-A1 Red List
Green Sandpiper	*Tringa ochropus*	1	2020	952	100	NERC_s41 Red List
Greenfinch	*Chloris chloris*	115	2020	802	100	Red List
Herring Gull	*Larus argentatus*	25	2021	799	100	NERC_s41 Red List
House Martin	*Delichon urbicum*	42	2022	799	100	Red List
House Sparrow	*Passer domesticus*	55	2022	799	100	Red List
Kingfisher	*Alcedo atthis*	11	2022	1000	100	BirdsDir-A1 WACA-Sch1-p1
Lapwing	*Vanellus vanellus*	6	2023	1000	100	NERC_s41 Red List
Linnet	*Linaria cannabina*	35	2018	1000	1000	NERC_s41 Red List
Little Egret	*Egretta garzetta*	39	2022	1000	100	BirdsDir-A1
Marsh Tit	Poecile palustris	1	2016	1000	1000	NERC_s41 Red List
Mistle Thrush	Turdus viscivorus	27	2023	799	100	Red List
Peregrine	*Falco peregrinus*	1	2015	1000	1000	BirdsDir-A1 WACA-Sch1-p1
Pintail	*Anas acuta*	5	2018	939	100	WACA-Sch1-p1
Pochard	*Aythya ferina*	17	2023	1000	100	Red List
Red Kite	*Milvus milvus*	211	2023	804	100	WACA-Sch1-

						p1
Redwing	*Turdus iliacus*	63	2023	799	100	WACA-Sch1-p1
Reed Bunting	*Emberiza schoeniclus*	4	2023	1000	1000	NERC-S41
Skylark	*Alauda arvensis*	59	2021	799	100	NERC_s41 Red List
Spotted Flycatcher	*Muscicapa striata*	1	2023	1000	1000	NERC_s41 Red List
Starling	*Sturnus vulgaris*	48	2022	799	100	NERC_s41 Red List
Swift	*Apus apus*	30	2021	799	100	Red List
Tree Sparrow	*Passer montanus*	1	2016	1000	1000	NERC_s41 Red List
Yellow Wagtail	*Motacilla flava flavissima*	1	2018	529	100	NERC_s41 Red List
Yellowhammer	*Emberiza citrinella*	16	2023	799	100	NERC_s41 Red List
Invertebrates						
Small Heath	*Coenonympha pamphilus*	8	2018	1000	1000	NERC-S41
Stag Beetle	*Lucanus cervus*	105	2023	246	1	NERC_s41 HabDir-A2np WACA-Sch5-s9.5a
White-letter Hairstreak	*Satyrium w-album*	1	2016	753	100	NERC-S41
Cinnabar	*Tyria jacobaeae*	1	2019	799	100	NERC-S41
Feathered Gothic	*Tholera decimalis*	1	2020	991	1	NERC-S41
Terrestrial Mammals (bats)						
Brown long-eared	*Plecotus auritus*	36	2022	394	1	HabReg_2 NERC_s41 HabReg_4WCA5
Common Pipistrelle	*Pipistrellus pipistrellus*	66	2023	324	1	HDir4, HabReg_2, WCA5
Leisler's bat	*Nyctalus leisleri*	3	2021	604	100	NERC_s41, HabReg_2, WCA5
Nathusius's Pipistrelle	*Pipistrellus nathusii*	3	2020	1000	1000	HDir4, HabReg_2, WCA5
Natterer's bat	*Myotis nattereri*	3	2016	1000	1000	HDir4, HabReg_2, WCA5
Noctule	*Nyctalus noctula*	39	2023	620	1	HabReg_4 HabReg_2, WCA5
Serotine	*Eptesicus serotinus*	7	2023	667	100	HabReg_4 HabReg_2, WCA5
Soprano Pipistrelle	*Pipistrellus pygmaeus*	62	2023	381	1	HabReg_4 HabReg_2, WCA5, NERC-S41
Terrestrial Mammals (excl. bats)						
[redacted]						
Hedgehog	*Erinaceus europaeus*	22	2023		1	NERC-S41

Table 3b. Species status key.

Abbreviation	Legislation
HabReg_2	Schedule 2 of Conservation of Habitats and Species Regulations 2017 (European Protected Species animal) – It is an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 2.

HabReg_4	Schedule 4 of Conservation of Habitats and Species Regulations 2017 (European Protected Species animal) – It is an offence (subject to exceptions) to deliberately capture, kill, disturb, or trade in the animals listed in Schedule 4.
NERC_s41	Priority Species listed under Section 41 of the Natural Environment and Rural Communities Act 2006.
WCA_1p1	Schedule 1 Part 1 of the Wildlife and Countryside Act 1981 (as amended) – birds protected from disturbance at their nests, or their dependent young.
WCA_5s94b/c	Schedule 5 Section 9 Parts 4b/c of the Wildlife and Countryside Act 1981 (as amended) – Animals which are protected from intentional disturbance while occupying a structure or place used for shelter or protection / Animals which are protected from their access to any structure or place which they use for shelter or protection being obstructed.
WCA_8	Schedule 8 of the Wildlife and Countryside Act 1981 (as amended) – Plants and fungi that are protected from intentional picking, uprooting or destruction; selling, offering for sale, possessing or transporting for the purpose of sale; advertising for buying or selling.
WCA_9	Schedule 9 of the Wildlife & Countryside Act 1981 - Animals and Plants which are established in the wild
Red List	Birds of Conservation Concern Red List species

6.2.2 Two bat mitigation licences have been granted within the last 10 years inside a 1-kilometre radius of the application site. Licence 2020-44644-EPS-MIT was granted in 2020 for a project resulting in the destruction of brown long eared and common pipistrelle non-breeding roosts approximate 225m to the north west, and licence 2020-49294-EPS-MIT, which resulted in the destruction of common pipistrelle and soprano pipistrelle non-breeding day roosts at a site about 720m to the south east.

6.2.3 OS mapping shows no natural ponds within a 500m radius of the application site; a swimming pool is the only mapped pond within the 500m of the application site. No mitigation licences for great crested newt have been issued within 1 kilometre radius but there are four survey class licence returns showing the presence of great crested newts within a 1km radius (between 670m and 811m to the south and west of the site).

6.2.4 The low resolution GCN Impact Risk Map available on the NatureSpace website for District Licencing shows the site is within the green zone – i.e. low habitat suitability where GCN maybe be present.

6.3 Historic and Current Land Use

6.3.1 Google Satellite imagery dating back to 2003 shows that the application site has not significantly changed since.

7 UK HABITAT CLASSIFICATION SURVEY

7.1 Overview

7.1.1 The application site is a commercial plot with office and storage buildings located off of Crest Close in Ruscombe near Twyford, Berkshire. The site is in an suburban setting surrounded by residential properties and their associated gardens.

7.1.2 The following UK Habitat Classification (UKHab) habitats were observed during the site walkover: u1b Developed land – sealed surface; Built, linear features (u1e); u1c Artificial unvegetated – unsealed surface; individual tree, and tree line (other coniferous woodland w2c). The UKHab primary habitats and secondary codes are described alongside photographs (see **Photographs 1-9**) as follows:

7.1.3 The UKHab primary habitats and secondary codes are described alongside photographs (see **Photographs 1-9**) as follows:

7.2 u1b Developed land – sealed surface

7.2.1 The site's developed comprised the office buildings and a detached shed (**Photographs 1 & 2**).

Photograph 1.Office building viewed from the drive to the south (u1b).

Photograph 2. Shed on the southern boundary (u1b).

7.3 u1c Artificial unvegetated – unsealed surface

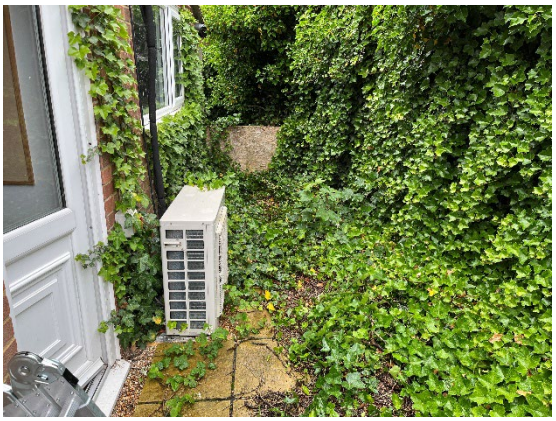
7.3.1 A gravel driveway formed parking at the front of the property a (**Photograph 3**). The gravel had occasional ruderal plants growing including bramble (*Rubus fruticosus* agg.), sycamore sapling (*Acer pseudoplatanus*), nipplewort (*Lapsana communis*), barren brome (*Anisantha sterilis*), wall barley (*Hordeum murinum*), petty spurge (*Euphorbia pepulus*) and broad-leaved willowherb (*Epilobium montanum*).

Photograph 3. Gravel driveway with occasional ruderal plants

Photograph 4. Gravel driveway looking towards site entrance.

7.4 U1e Built linear features

7.4.1 The land immediately around the office building was paved with a covering of ivy and occasional ruderal species in places including red valerian (*Valeriana rubra*), hedge mustard (*Sysimbrian officinale*) and bramble (*Rubus fruticosus* agg.). A small, individual silver birch (*Betula pendula*) tree was growing to the north west of the building.



Photograph 5. Paved area to the north of the office building with partial ivy cover

Photograph 6. Sparse ruderal vegetation and small silver birch tree to north west of office building.

7.5 Line of trees (Other coniferous woodland)

7.5.1 The site's southern boundary was formed by an established line of cypress (*Cuppressus* sp.) trees (**Photograph 7**).

Photograph 7. Line of cypress trees on the southern boundary to the rear of the shed.

Figure 1 – UK Habitat Classification Plan

8 PRELIMINARY ROOST ASSESSMENT

8.1 Overview

8.1.1 The findings from the external and internal inspections carried out for the buildings are described with photographs and annotated in a plan (see **Figure 2**), as follows:

8.2 External Survey

8.2.1 The office buildings comprised a flat roofed section to the front (south) and pitched roof building to the north, which were linked by a plastic corrugated sheet roof covered courtyard (**Photographs 8 - 10**).

Photograph 8. Pitched roofed northern section of the office building viewed from the north.

Photograph 9. The flat roofed section of the office building viewed from the south.

Photograph 10. The plastic corrugated sheet roof linking the two buildings viewed from inside.

8.2.2 The concrete roof tiles and ridges on the pitched roofed building were all in place and tightly fitting offering no visible roosting opportunities for bats (**Photograph 11; Target notes 1 & 2**). The tile ends at the gables were all mortared fully with no visible gaps suitable for roosting bats (**Photograph 12; Target note 3**). The barge boards along the eastern side of the roof were mainly closely fitted to the brickwork apart from a narrow gap at the north eastern corner offering a potential roosting site for bats of limited extent; however no evidence of use by bats was found (**Photograph 13; Target notes 4 & 5**). The timber soffit box along the western eaves of the building was tightly fitted to the

external brickwork; but there was some superficial decay at the northern end that was unsuitable for bats (**Photographs 14 & 15; Target note 6**).

Photograph .11. Tightly fitted concrete roof tiles ad ridges.

Photograph 12. Intact mortar and render at north facing gable end.

Photograph 13. Slightly raised barge board at north eastern corner.

Photograph 14. Superficial decay at the end of the soffit on the western side of the pitched roof.

8.2.3 The corrugated roof cover between the two buildings was of simple construction and did not offer any roosting opportunities for bats (**Photograph 10; Target note 7**). The bitumen roof on the flat roofed building was sealed around the eaves offering no roosting opportunities for bats (**Target note 8**). The southern end of the flat roofed building was clad with overlapping timber boards, which were raised slightly in places (**Photograph 16; Target note 9**). These boards created gaps of limited extent that showed no evidence of the presence of bats when closely inspected.

Photograph .15. Tightly fitted barge boards on western side of the northern section of the building.

Photograph 16. Timber cladding at the southern end of the office building with slight gaps between boards.

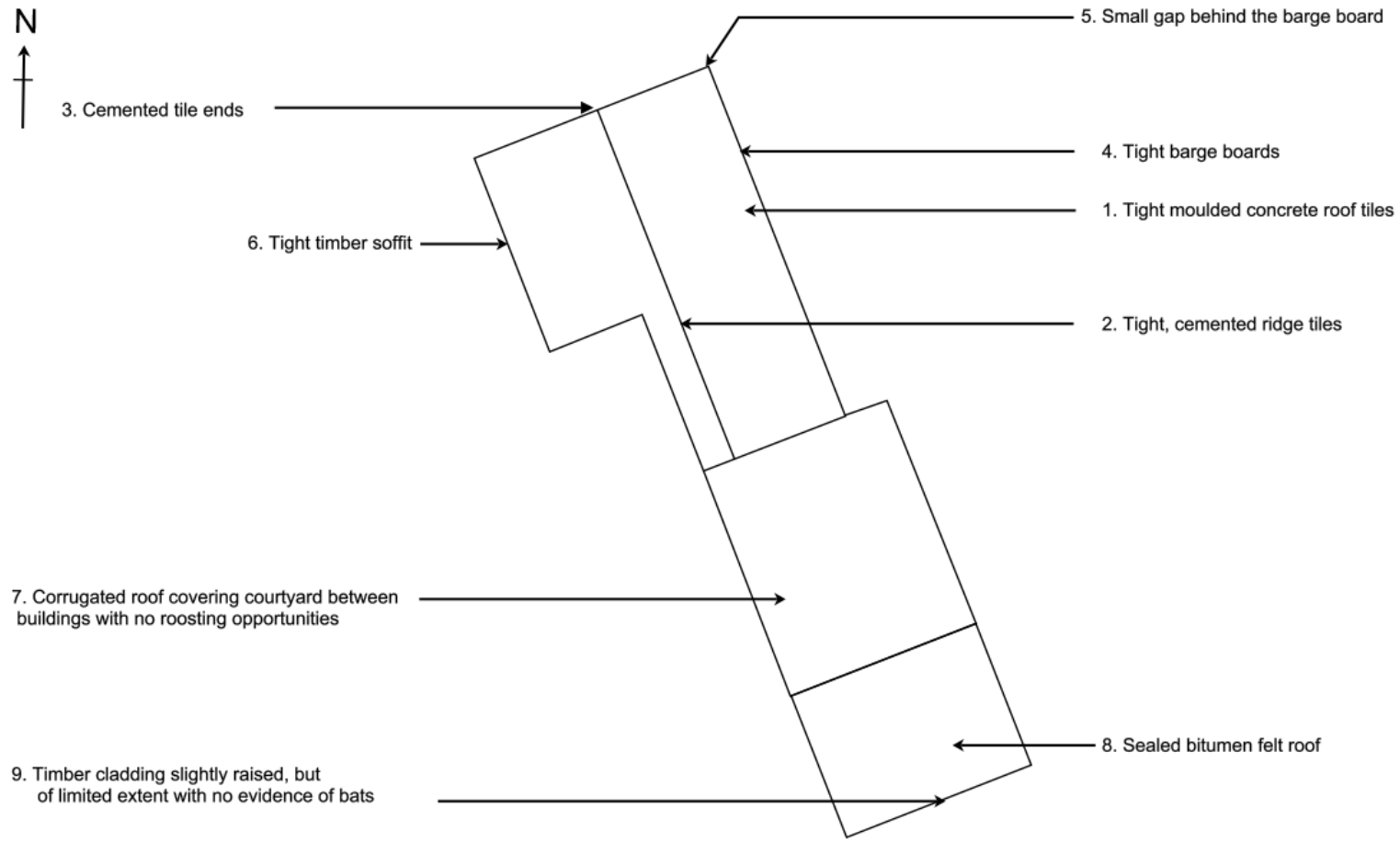
8.2.4 The shed was a simple, timber structure with a bitumen felt covered roof (**Photographs 17 & 18**). The timber panels and felt roof lacked any crevices suitable for bats and was considered to be of negligible bat roost potential

Photograph 17. The shed at the southern end of the site.

Photograph 18. The tightly fitted bitumen felt roof.

8.3 Internal Survey

8.3.1 The interior of the office building had no enclosed void and comprised decorated office space. The interior of the building had no evidence of roosting bats and lacked suitable roosting opportunities for bats.



Drawn by:	Date	Scale:	Hill Top Yard Twyford	JOHNWENMAN ecological consultancy
JW	July 2025	Not to scale	Preliminary Bat Roost Assessment	

Figure 2 – Preliminary Bat Roost Assessment Plan

9 DISCUSSION

9.1 Designated Sites for Nature Conservation

Evaluation of Baseline

9.1.1 The desk study revealed that the application site is not statutorily designated for its wildlife interest and therefore is not currently recognised as being of international, national or county level conservation significance. There are no Site of Special Scientific Interest (SSSI) of internationally important sites i.e. Special Protection Areas (SPA) or Special Areas of Conservation (SAC) within a 2km radius and a search of the Impact Risk Zone (IRZ) criteria does not relate to residential development schemes.

9.1.2 The desk study returned three non-statutorily designated wildlife sites (Local Wildlife Sites (LWS) within 1km with the closest being Ruscombe Village Pond about 670m to the south east.

Impact Assessment

9.1.3 The criteria for the SSSI Impact Risk Zone indicates that at the location of the application site, the proposed development is highly unlikely to have a harmful effect on SSSIs or other statutorily designated sites of national and international conservation importance. Therefore, it is recognised that consultation with Natural England on the likely impacts of development on the statutory site that is not required.

9.1.4 Furthermore, considering the nature, scale and distance of the development from the sites, no adverse effects are anticipated on the locally designated sites.

9.2 Habitats

Evaluation of Baseline

9.2.1 The site is characterised by typical built up habitats or those characteristic of urban areas – i.e. office and storage buildings (u1b), hard standings (u1e), gravel driveway (u1c), individual trees and a line of coniferous trees – habitats of very low to medium distinctiveness. The habitats, are not characteristic of habitats of principal importance for conservation ('Priority Habitats') (as defined under Section 41 of the NERC Act 2006), did not support any plant species of conservation importance and therefore are not considered to be of ecological value at scale beyond the site.

9.2.2 *Impact Assessment*

9.2.3 The proposed redevelopment of the site will only lead to the replacement of the existing built development replacing very low distinctiveness habitats in the main, and as such, are highly unlikely to have any adverse impacts on habitats of ecological value. The self-set, immature birch tree growing to the rear of the building is very small and of negligible ecological value currently and its removal will have negligible impact on the site's ecological value.

9.3 Bats

Evaluation of Baseline

9.3.1 Two mitigation licences for bats have been granted by Natural England within a 1km radius of the site. Additionally, TVERC has recent records of eight bat species within the search area: serotine (*Eptesicus serotinus*), Leisler's bat (*Nyctalus leisleri*), noctule (*Nyctalus noctula*), common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*), Nathusius'pipistrelle (*Pipistrellus nathusii*), Natterer's bat (*Myotis nattereri*), noctule (*Nyctalus noctula*), and brown long-eared (*Plecotus auritus*). However, the buildings and trees on site lacked any features suitable for roosting bats, therefore the site is unlikely to support to roosting bats. Furthermore, the site comprised primarily of built development providing very poor habitat for feeding bats, as such, it is considered that the site is unlikely to be of value to local bat populations.

Impact Assessment

9.3.2 The development proposals to the replace the existing buildings to provide a residential home. These proposals will have no impact on features on features suitable for roosting bats and will also not affect habitats of importance to bats for feeding and commuting, and as such the impacts of the proposals on bats are considered to be negligible.

9.3.1 The proposed development should incorporate a sensitive lighting scheme to minimise any impacts on commuting/foraging bats. Artificial lighting has been shown to alter the activity of nocturnal species and certain bat species have been found to be especially averse to lighting and actively avoid lit areas (ILP 2023). To prevent adverse impacts from lighting, any lighting should be designed with the aim of reducing light spillage (see **Section 10.2**).

9.3.2 The proposals present opportunities for the site's enhancement for bats and recommendations are set out in Section 10.5.

9.4 Great Crested Newt (and other amphibians)

Evaluation of Baseline

9.4.1 The desk study returned no European Protected Species Licences granted for Great Crested Newt (GCN) within a 1km radius of the application site. The TVERC database includes one record of great crested newt from land over 700m from the site and there are survey class licence returns for great crested newts at sites between 693m and 811m from the site. There is a record of common toad (*Bufo bufo*) – a Priority Species (as defined under S41 of the NERC Act 2006) within 810m of the site also. The NatureSpace District Level Licensing Impact Risk Zone map for Wokingham District shows that the application site falls within the green zone i.e. moderate habitat suitability where great crested newts may be present.

9.4.2 There is no suitable amphibian breeding habitat on site (i.e. standing water) and the site provides very poor terrestrial habitat for newts and toads, largely comprising hard standing and buildings. Furthermore, there is no standing water suitable for amphibians shown on OS mapping within a 500m radius and all pre-existing records are all more than 693m away and isolated from the site by residential development and main roads. Therefore the site is highly unlikely to support great crested newts or other amphibian species.

Impact Assessment

9.4.3 The site is considered to be highly unlikely to support great crested newts and common toad, therefore the proposals are highly unlikely to have any impact on great crested newt or toad individuals or habitat, and as such could proceed lawfully with no requirement for a mitigation licence, or risk of impact on a Priority Species.

9.4.4 There would be a very small risk of individual GCNs and other amphibians utilising cover onsite e.g. beneath buildings, in the work area, but if simple precautions are adopted, the risk of harming GCNs is negligible (refer to recommendations in **Section 10.3**).

9.5 Hazel Dormouse

Evaluation of Baseline

9.5.1 The desk study data included no recent hazel dormouse records within a 1km radius of the site and the search of MAGIC for granted dormouse EPS licence applications also returned none within the same radius.

9.5.2 The urban habitats on site are unsuitable habitats for hazel dormice – a species that requires woodland dense scrub and hedgerow habitats - and as such, this species is highly unlikely to be found on site.

Impact Assessment

9.5.3 Without any pre-existing records of hazel dormice in the search area, or habitats suitable for this species, it is highly unlikely that dormice will be affected by the proposals.

9.6 Reptiles

Evaluation of Baseline

9.6.1 The desk study data included recent records of grass snake (*Natrix helvetica*) within a 1km radius of the application site. The urban habitats on site are unsuitable for reptiles and therefore are highly unlikely to support established reptile populations.

Impact Assessment

9.6.2 The proposals are highly unlikely to have any impact on reptiles or their habitats.

9.7 Birds

Evaluation of Baseline

9.7.1 The desk study data included recent records of songbird species on the Birds of Conservation Concern red lists e.g. house sparrow that may be found in urban and suburban habitats nesting in buildings and dense vegetation and these species, and other commonly occurring species, could nest within coniferous tree line and building; however, no evidence of nesting birds was visible in the building during the survey and these are unlikely to support nesting birds. Overall, the application site is considered to be of no more than site level value for nesting birds and is unlikely to contain a bird assemblage of conservation importance.

Impact Assessment

9.7.2 In the wider context of the local surroundings, the removal of any of the established coniferous trees (if necessary) is highly unlikely to have a significant impact on local bird populations; however, there is a low risk that it could have an impact on active bird nests. As such, timing precautions for the removal of the shrubs must be adhered to avoid damaging active bird nests (refer to recommendations in **Section 10.4**).

9.8.2 There are records of hedgehog – a Priority Species (as defined under S41 of the NERC Act 2006) locally. The site provides poor feeding habitat for this species, but it is possible that they could cross the site and seek shelter beneath any materials on site.

Impact Assessment

9.8.3 The likelihood of the presence of mammals within the proposed development area is low and therefore no adverse effects are anticipated. The proposals present opportunities to enhance the site for hedgehog (refer to recommendations in Section 10).

9.9 Invertebrates

Evaluation of Baseline

The desk study data included recent records of notable invertebrates including stag beetle and a range of moth and butterfly species; however, the built up habitats on site are of little value to invertebrates and unsuitable for the notable species recorded nearby.

Impact Assessment

9.9.1 The proposals will have no impact on land suitable for invertebrates and therefore there is a negligible likelihood of the proposals having any impact on invertebrate populations.

10 RECOMMENDATIONS

10.1 Overview

10.1.1 This chapter provides the details regarding proposed avoidance, mitigation, compensation and enhancement measures, including measures to enable legislative compliance.

10.2 Bats

10.2.1 During construction, artificial lighting should be avoided, but if essential it should be kept to a minimum, and should using directed warm white LED (2700k) lights controlled by passive infrared motion sensors so that they operate only when necessary.

10.2.2 In the long term, the new dwelling should minimise light levels and spill. Specifically, external lighting should be avoided, but if essential, lighting with low or no UV content, i.e. warm white LED lamps (2700K or below), should be used in place of mercury and metal halides and luminaires or other directional light accessories should be used (BCT and ILP, 2023). The detailed design for the new dwelling should include features to minimse light spill, such as avoiding skylights.

10.3 Amphibians and Mammals

10.3.1 To avoid contravening the legislation and harming individual amphibians and small mammals during the works, the following precautionary avoidance measures will be adopted during the construction:

- During works, any open excavations required for investigation works should be backfilled before nightfall or alternatively, escape ramps should be installed to allow individual animals to escape should they become trapped;

- Any building materials or materials excavated during the investigations that need to be stored on site prior to use/disposal will be raised off the ground on pallets or in skips to avoid them providing temporary resting places or hibernation sites; and

- In the unlikely event that a great crested newt (GCN) or mammal is encountered during the works, it will stop immediately and a licensed ecologist will be called onto site to attend to the animal and liaise with Natural England on how to proceed; work will continue only once written advice has been received.

10.3.2 Adhering to the simple avoidance measures outlined above should ensure that

amphibians and mammals are protected from reckless killing and injury during any subsequent works.

10.4 Nesting Birds

10.4.1 The removal of any trees (if required) should be completed outside of the peak bird nesting season (March to August) or alternatively, following an inspection by an ecologist confirming that there is no current nesting activity. If nesting birds are discovered before or during any work, work should stop immediately and should only continue once bird nesting has finished, i.e. young have fledged and left the nest.

10.5 Biodiversity Enhancement Measures

10.5.1 The planning proposals provide opportunities for the enhancement of the site's biodiversity value. The inclusion of the following recommendations would be of ecological benefit and be in line with the national and local planning policy:

- Wildlife-friendly, native landscaping using plants of UK provenance;
- Installation of building mounted woodcrete bat and bird boxes; and
- Creation of a stag beetle loggery

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APPENDIX 1 – LEGISLATIVE BACKGROUND

Amphibians

The seven native species of amphibian receive protection under the W&AC 1981 (as amended). The four widespread and common amphibians (common frog, toad, smooth newt and palmate newt) receive only limited protection – making their sale illegal.

The great crested newt (*Triturus cristatus*) receives full protection under the W&CA 1981 (as amended) and under the Habitat Regulations 2019. The combined legislation makes it illegal to:

- intentionally or recklessly kill, injure or take a great crested newt;
- possess or control any live or dead specimen or anything derived from a great crested newt;
- intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a great crested newt; and
- intentionally or recklessly disturb great crested newts; in particular, any disturbance which is likely to impair their ability to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating animals, to hibernate or migrate.

Great crested newts (*T. cristatus*) and common toads (*Bufo bufo*) are species of principal importance for the conservation of biodiversity in England (*'UKBAP Priority Species'*) under Section 41 of the NERC Act 2006.

[redacted]

Bats

All bat species in Britain are fully protected by the W&CA 1981 (as amended) and by the Habitat Regulations 2019. In summary, the combined legislation makes it an offence to:

- damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a bat;

- deliberately, intentionally or recklessly disturb bats; in particular, any disturbance which is likely to impair the ability of bats to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate; or to significantly affect the local distribution or abundance of the species; and
- deliberately kill, injure or take any bat.

Birds

All wild birds are protected under the W&CA 1981 (as amended). The Act makes it an offence to kill, injure or take a wild bird or to damage or destroy the nest of a wild bird whilst in use or being built. Species listed on Schedule 1 of the Act, such as barn owls and kingfishers, are afforded additional protection against disturbance while nesting.

Hazel dormice

Hazel dormice receive full protection under the W&CA 1981 (as amended) and under the Habitat Regulations 2019. These make it illegal to:

- intentionally or recklessly kill, injure or take a dormouse;
- possess or control any live or dead specimen or anything derived from a dormouse;
- damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a dormouse; and
- intentionally or recklessly disturb dormice; in particular, any disturbance which is likely to impair their ability to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating animals, to hibernate or migrate.

Invasive non-native plants

The W&CA 1981 (as amended) provides the primary controls on the release of non-native species into the wild in Great Britain. It is an offence under Section 14(2) of the Act to 'plant or otherwise cause to grow in the wild' any plant listed in Schedule 9, Part II. The species listed in the Act include Japanese knotweed (*Fallopia japonica*), giant hogweed (*Heracleum mantegazzianum*) and Himalayan balsam (*Impatiens glandulifera*).

Otters

Otters are fully protected by the W&CA 1981 (as amended) and by the Habitat

Regulations 2019. In summary, the combined legislation makes it an offence to:

- damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by an otter;
- deliberately, intentionally or recklessly disturb otters; in particular, any disturbance which is likely to impair the ability of otters to survive, breed or reproduce or nurture their young; or to significantly affect the local distribution or abundance of the species; and
- deliberately kill, injure or take any bat.

Reptiles

The four widespread reptiles most likely to be encountered (adder, grass snake, slow worm and common lizard) are protected under the W&CA 1981 (as amended). The Act makes it an offence to intentionally kill, injure, possess or sell any of the species.

The aforementioned species are all listed as being of principal importance for the conservation of biodiversity in England (*'UKBAP Priority Species'*) under Section 41 of the NERC Act 2006.

Water voles

Since April 2008, water voles have received full protection under Section 9 in Schedule 5 of the W&CA 1981 (as amended). This makes it an offence to intentionally kill, injure or take water voles or to possess or control live or dead water voles or derivatives. It is an offence to intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection or intentionally or recklessly disturb water voles whilst occupying a structure or place used for that purpose.

The water vole is listed as being of principal importance for the conservation of biodiversity in England (*'UKBAP Priority Species'*) under Section 41 of the NERC Act 2006.

Wild mammals

Under the Wild Mammals (Protection) Act 1996 it is an offence to intentionally inflict unnecessary suffering, as specified by the Act, on any wild mammal.