

**Land at Luckley House School
Luckley Road
Wokingham
Berkshire
RG40 3EU**

Preliminary Ecological Appraisal

Ref: R3008_PEA_b

Report Quality Control Information	
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1 EXECUTIVE SUMMARY

- 1.1.1** John Wenman Ecological Consultancy LLP was commissioned by Luckley House School to carry out a Preliminary Ecological Appraisal (PEA) for the land south of the School in Wokingham, Berkshire. The PEA was commissioned to support a planning application to be submitted to Wokingham Borough Council (WBC) seeking consent for the addition of a grass sports pitch.
- 1.1.2** The application site covers an area of 1.92ha with the following UK Habitat Classification (UKHab) habitats observed during the site walkover: g3c Other neutral grassland, h2a Native hedgerow, 32 Scattered trees and 33 Tree line.
- 1.1.3** The desk study revealed that the survey site is not statutorily or non-statutorily designated for its wildlife interest and therefore is not currently recognised as being of international, national or county level conservation significance. The site falls within the Impact Risk Zones (IRZ) for SSSIs in the search area; however, the proposed development does not fall under any of the categories for activities that could affect these or locally important sites in the search area.
- 1.1.4** The survey site comprises other neutral grassland with a native hedgerow, scattered trees and tree lines along the southern, western and northern boundaries respectively – i.e. habitats of low to medium distinctiveness of no more than site level ecological value. The hedgerow on the southern boundary to be retained is a Priority Habitat (as defined under the NERC Act 2006); no other Priority Habitats are onsite.
- 1.1.5** **Section 9** of this report provides recommendations regarding habitat protection measures, netting design to lessen impacts on bats and other wildlife, precautionary mitigation for amphibians, reptiles and small mammals, precautionary measures for nesting birds, and ecological enhancements.

2 INTRODUCTION

2.1 Project Background

2.1.1 John Wenman Ecological Consultancy LLP was commissioned by Luckley House School to carry out a Preliminary Ecological Appraisal (PEA) for the land south of the School in Wokingham, Berkshire.

2.1.2 The PEA was commissioned to support a planning application to be submitted to Wokingham Borough Council (WBC) seeking consent for the addition of a grass sports pitch (refer to proposed site plan in **Appendix 2**).

2.2 Site Location and Context

2.2.1 The application site covers a 1.92ha area of a field to the south of Luckley House School in Wokingham, Berkshire (OS Grid Reference: SU 80688 66964).

2.2.2 The field is currently in use as a agricultural grassland and is bordered by suburban housing to the west, Luckley House School Grounds and mixed priority woodland to the north, and further parcels of mixed woodland and agricultural land to the east and south. Woodcray Manor, Woodcray Manor Golf Club, and their associated grounds are situated approximately 200 metres to the south. Furthermore, a railway line bisects the land from southeast to northwest approximately 370 metres to the east.

2.3 Objectives

2.3.1 The aim of this updated 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 > minimise > remediate > 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 Overview

3.1.1 The following legislation is considered relevant for the purpose of this preliminary ecological appraisal:

- Wildlife and Countryside Act (W&CA) 1981 (as amended)
- Conservation of Habitats and Species Regulations ('Habitat') Regulations 2017 (as amended)
- Countryside and Rights of Way (CROW) Act 2000
- Natural Environment and Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992
- 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 within the UK under the Habitat Regulations (e.g. bats), whereas others, may only be afforded protection through national legislation such as the Wildlife and Countryside Act 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 conservation advisory organisation, Natural England, is responsible for issuing European Protected Species (EPS) mitigation licences, which permit activities that would otherwise lead to an infringement of the Habitat Regulations 2017. An EPS mitigation licence can be issued if the following three tests have been met:

- **Regulation 55(9)(a)** - there is "*no satisfactory alternative*" to the derogation;
- **Regulation 55(9)(b)** - the derogation "*will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range*"; and
- **Regulation 55(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*".

3.2.2 Local Planning Authorities (LPAs) have a statutory duty under Regulation 7(3e) of the Habitat Regulations 2017 to regard requirements of the Habitats Directive in the exercise of their functions. Consequently, the LPA must consider and determine whether these three tests are likely to be satisfied by an application affecting EPS before granting planning permission.

4 PLANNING POLICY

4.1 National Planning Policy

4.1.1 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.'*

4.1.2 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 180 sets out the principles local authorities should apply when determining planning applications as follows:

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

186. *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 ⁶⁷ 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.

4.2 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 Zone of Influence

5.1.1 Ecological assessment guidance (CIEEM 2018) recommends that all ecological features that occur within a 'Zone of Influence' (ZoI) for a proposed development are investigated. The ZoI includes:

- Areas directly within the land take for the proposed development and access;
- Areas which will be temporarily affected during construction;
- Areas likely to be impacted by hydrological disruption; and
- Areas where there is a risk of wider disbenefits including, but not limited to, any increase in air, water, or noise pollution; or visual or vibrational disturbance during construction and/or operation.

5.1.2 The ZoI is variable depending on the nature of the construction activities and the ecological receptors affected. For this assessment the following zones have been defined as described in Table 5.1.

Ecological features	Zone of influence	Notes
Internationally designated sites - see notes	5km	Special Area of Conservation (SAC), Special Protection Area (SPA) & Ramsar site
Nationally designated sites – see notes	2km	Sites of Special Scientific Interest (SSSI)
Local sites – see notes	1km	Local Wildlife Site (LWS), Local Nature Reserve (LNR) & Biodiversity Opportunity Area (BOA)
Species records (notable and protected) – see notes	1km	Refer to Table 5.2
Habitats of principal importance for conservation (HPI)	1km	As defined under Section 41 of the NERC Act 2006
Site (species and habitats)	Site and land within 30m (as access constraints allow)	

Legislation and Policy
Annex II of the Habitats Directive (non-priority species) - Endangered animal and plant species that are of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) requiring the designation of special areas of conservation.
Annex IV of the Habitats Directive - Animal and plant species of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) in need of strict protection. They are protected from killing, disturbance or the destruction of them or their habitat
Schedule 2 of Conservation of Habitats and Species Regulations 2010 (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.
Priority Species listed under Section 41 of the Natural Environment and Rural Communities Act 2006.
Schedule 1 Part 1 of the Wildlife and Countryside Act 1981 (as amended) – birds protected from disturbance at their nests, or their dependent young.
Schedule 5 Section 9 Part 1 (taking) of the Wildlife and Countryside Act 1981 (as amended) - Animals which are protected from being taken.

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.

5.2 Desk Study

- 5.2.1** A desktop study was conducted by Jake Morgan, a qualifying member of CIEEM. The study utilised data from the local environmental records centre and online resources to acquire information on the nature of the site and its surroundings and highlight any potential ecological features.
- 5.2.2** 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. NatureSpace impact risk maps were consulted to accurately predict great crested newt (GCN) presence through the analysis of habitat suitability in the landscape. A review of ecological information available for nearby developments on the Local Planning Authority's (LPA) planning portal was conducted.
- 5.2.3** The DEFRA Data Services Platform was used to obtain geospatial datasets for designated sites (i.e. RAMSAR, SPA, SAC, SSSI) and habitat inventories (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. Furthermore, 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.
- 5.2.4** Google Earth satellite imagery was 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.

5.3 Field Survey

- 5.3.1** A site walkover was undertaken on the 10th July 2025 by John Wenman MCIEEM. The site was surveyed using the UK Habitat Classification (UKHab) system (Butcher *et. al.* 2023) in accordance with the CIEEM 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.

- 5.3.2** 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.
- 5.3.3** This report will likely be valid for up to 18 months; after which point a professional ecologist may need to undertake a site visit and update the desk study and then review the report's validity (CIEEM 2019b).

6 DESK STUDY FINDINGS

6.1 Designated Sites and Habitats

- 6.1.1** The desk study returned one internationally designated sites within a 5km radius and no nationally designated statutory sites within a 2km radius. Three locally designated non-statutory site, i.e. Local Wildlife Site (LWS), were highlighted within a 1km search radius – see **Table 1a and 1b** below.

Table 1a. Statutorily designated sites within the vicinity of the site (Source: DEFRA).

Site name	Designation	Description	Distance from nearest site boundary (m)
Thames Basin Heath	Special Protection Area (SPA)	The Thames Basin Heaths SPA covers an area of 8,275 ha across Hampshire, Berkshire and Surrey. It is part of a complex of heathlands in Southern England that support important populations of breeding birds, including the Dartford Warbler, Nightjar and Woodlark.	4520 SE

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

Site name	Designation	Description	Distance from nearest site boundary (m)
Tench's Bridge	Local Wildlife Site (LWS)	A 7.57ha area of woodland and coppice with a stream running from north to south. Oak is the dominant tree in the canopy and there is much birch. In the wetter areas, in the west, alder is abundant. Species present include bluebell, remote sedge, dog's mercury and lady fern. In the wetter areas common marsh bedstraw and bugle can be seen.	830 SE
Gorrick Plantation	Local Wildlife Site (LWS)	This 77.88ha site consists of mainly woodland habitats with a little dry heath and acid grassland in a few places. The ridge edges also have species indicative of heath and acid grassland. Scot's Pine plantations dominate this working plantation. There are also other conifers including Western Hemlock-spruce and Corsican Pine. Ground flora can include Rhododendron, Bracken and Purple Moor-grass. Deciduous woodland is more prevalent at the edges of the site. Birch dominates but in the more species-rich areas on these acidic soils there's also Bracken, Remote Sedge and Honeysuckle. A notable patch of wet woodland in the northwest is characterised by willows, Alder and Birch. Ground flora includes ferns, <i>Sphagnum</i> sp. and Lesser Spearwort. There are elements of acid grassland, dry and wet heaths throughout with a small concentration in the west of the site. Purple Moor-grass is abundant but there's also Early Hair-grass, Field Woodrush and Sheep's Sorrel. Damper sections include Cross-leaved Heather, locally abundant <i>Sphagnum</i> sp. and Bulbous Rush.	860 SE
Land to the east and west of Sandhurst Road	Local Wildlife Site (LWS)	A 39.35ha site with a diverse mixture of woodland, wetland, heathland and grassland habitats as well as Queen's Mere Lake. There are areas of wet woodland with alder, birch and willow, which include more open areas with swamp habitat including areas dominated by bulrush (reedmace). Some of the wet woodland is degraded mire habitat that has been invaded by birch, willow and some alder. There are drier woodland areas with pine and birch and more semi-natural stands of acidic oak and	940 SE

		birch woodland. Amongst the woodland there are small areas of heathland and acid grassland, a degraded valley mire and open mixtures of grassland, mire and swamp including an area of water horsetail swamp. There is also an area of remnant rush pasture.	
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6.2 Protected and Notable Species

6.2.1 The search of the TVERC database revealed a range of protected and/or notable species records dating from 1984 onwards; no records were found for the application site. Only recent records (no more than 10 years old) and of importance at a national or international are included in this report (see **Tables 2a & 2b**).

Table 2a. 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						
Great crested newt	<i>Triturus cristatus</i>	6	2021	600	10	Hab_4 HabReg_2 NERC_s41 WCA_5s94b/c
Reptiles						
Grass snake	<i>Natrix helvetica</i>	1	2019	680	1	WCA_5s91t NERC_s41
Slow worm	<i>Anguis fragilis</i>	4	2019	680	1	WCA_5s91t NERC_s41
Mammals (Excluding bats)						
Eurasian badger	<i>Meles meles</i>	28	2025	320	10	Badgers-1992
Hedgehog	<i>Erinaceus europaeus</i>	11	2023	320	10	NERC_s41
Bats						
Brown long-eared	<i>Plecotus auritus</i>	22	2023	170	1	Hab_4 HabReg_2 NERC_s41 WCA_5s94b/c
Common pipistrelle	<i>Pipistrellus pipistrellus</i>	64	2022	170	1	Hab_4 HabReg_2 WCA_5s94b/c
Leisler's bat	<i>Nyctalus leisleri</i>	1	2020	890	10	Hab_4 HabReg_2 WCA_5s94b/c
Nathusius's pipistrelle	<i>Pipistrellus nathusii</i>	2	2017	590	10	Hab_4 HabReg

						_2 WCA_5s 94b/c
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	35	2023	170	10	Hab_4 HabReg _2 NERC_s 41 WCA_5s 94b/c
Noctule	<i>Nyctalus noctula</i>	16	2022	280	10	Hab_4 HabReg _2 NERC_s 41 WCA_5s 94b/c
Serotine	<i>Eptesicus serotinus</i>	2	2021	N/A	N/A	Hab_4 HabReg _2 WCA_5s 94b/c
Birds						
Barn owl	<i>Tyto alba</i>	4	2015	750	1000	WCA_s1 p1
Brambling	<i>Fringilla montifringilla</i>	2	2021	310	1000	WCA_s1 p1
Bullfinch	<i>Pyrrhula pyrrhula</i>	5	2022	310	100	NERC_s 41
Crossbill	<i>Loxia curvirostra</i>	1	2021	N/A	N/A	WCA_s1 p1
Dunnock	<i>Prunella modularis</i>	2	2024	650	10	NERC_s 41
Fieldfare	<i>Turdus pilaris</i>	2	2021	610	10	WCA_s1 p1 Bird-Red
Firecrest	<i>Regulus ignicapilla</i>	2	2022	310	1000	WCA_s1 p1
Herring gull	<i>Larus argentatus</i>	1	2020	530	10	NERC_s 41 Bird-Red
Hobby	<i>Falco subbuteo</i>	1	2015	310	1000	WCA_s1 p1
House martin	<i>Delichon urbicum</i>	6	2023	610	10	Bird-Red
House sparrow	<i>Passer domesticus</i>	1	2020	890	10	NERC_s 41 Bird-Red
Lapwing	<i>Vanellus vanellus</i>	9	2023	310	1000	NERC_s 41 Bird-Red
Lesser spotted woodpecker	<i>Dryobates minor</i>	1	2022	510	10	NERC_s 41 Bird-Red
Linnet	<i>Linaria cannabina</i>	5	2023	310	1000	NERC_s 41 Bird-Red
Mistle thrush	<i>Turdus viscivorus</i>	10	2023	310	1000	Bird-Red
Red kite	<i>Milvus milvus</i>	16	2023	310	1000	WCA_s1 p1
Skylark	<i>Alauda arvensis</i>	1	2022	310	1000	NERC_s 41 Bird-Red
Song thrush	<i>Turdus philomelos</i>	2	2020	310	1000	NERC_s 41
Spotted	<i>Muscicapa</i>	1	2015	610	10	NERC_s

flycatcher	<i>striata</i>					41 Bird-Red
Swift	<i>Apus apus</i>	1	2019	560	10	Bird-Red
Woodcock	<i>Scolopax rusticola</i>	1	2016	310	1000	Bird-Red
Invertebrates						
Stag beetle	<i>Lucanus cervus</i>	43	2023	270	100	Ann2np NERC_s 41
Flowering plants						
Bluebell	<i>Hyacinthoides non-scripta</i>	3	2023	730	100	WACA-Sch8

Table 2b. Species status key.

Abbreviation	Legislation
Hab_2np	Annex II of the Habitats Directive (non-priority species) - Endangered animal and plant species that are of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) requiring the designation of special areas of conservation.
Hab_4	Annex IV of the Habitats Directive - Animal and plant species of Community interest (i.e. endangered, vulnerable, rare or endemic in the European Community) in need of strict protection. They are protected from killing, disturbance or the destruction of them or their habitat
HabReg_2	Schedule 2 of Conservation of Habitats and Species Regulations 2010 (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.
NERC_s41	Priority Species listed under Section 41 of the Natural Environment and Rural Communities Act 2006.
RL-Eng-post2001-NT	The IUCN Red List category - Near Threatened - Taxa where it has been evaluated against the criteria but does not qualify for Critically Endangered, Endangered or Vulnerable now, but is close to qualifying for or is likely to qualify for a threatened category.
WACA-Sch1-p1	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_5s91t	Schedule 5 Section 9 Part 1 (taking) of the Wildlife and Countryside Act 1981 (as amended) - Animals which are protected from being taken.
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.
PBA	Protection of Badgers Act 1992
Red List	Birds of Conservation Concern Red List
Amber List	Birds of Conservation Concern Amber List
NS	Nationally Scarce

6.2.2 Eight bat mitigation licences have been granted within a 2-kilometre radius of the application site within the last 10 years. The closest licence to have been granted is for the damage and destruction of a common pipistrelle (*Pipistrellus pipistrellus*) non-breeding roost at a residential site approximately 1430m north.

6.2.3 The NatureSpace great crested newt (GCN) Impact Risk Zone map for Berkshire depicts that the application site falls within an amber risk zone: these are defined as suitable habitat where GCN are likely to be present. Ordnance Survey mapping shows that there are four ponds within a 500m

radius of the site, situated approximately 210m north, 240m southeast, 280m southeast and 360m southeast.

6.3 Historic and Current Land Use

- 6.3.1** Google Earth Satellite imagery dating back to 1985 shows that there has not been a significant change in the land use within the application site boundary, which has comprised an agricultural field throughout that period.

7 FIELD SURVEY FINDINGS

7.1 Overview

- 7.1.1** The application site covers a 1.92ha section of land within a field to the south of Luckley House School in Wokingham, Berkshire.
- 7.1.2** The UK Habitat Classification (UKHab) habitats observed during the site walkover ranged from low to medium distinctiveness habitats and comprised: g3c Other neutral grassland, with h2a Native hedgerow, 32 Scattered trees and 33 Tree line on the site boundaries.
- 7.1.3** The UKHab primary habitats and secondary codes are described alongside photographs (**Photographs 1-6**) and a survey plan (see **Figure 1**) as follows:

7.2 g3c – Other neutral grassland

106 Mown, 10 Scattered scrub, 11 Hedgerow with trees, 32 Scattered trees

- 7.2.1** The site comprised other neutral grassland. The grassland within the application site boundary had been recently cut at the time of the survey; the remaining part of the site was uncut and this was used to enable an accurate survey of the species present to be carried out. The sward had a range of grassland and herbaceous species including Yorkshire fog (*Holcus lanatus*), cock's-foot (*Dactylis glomerata*), common bent (*Agrostis capillaris*), false oat grass (*Arrhenatherum elatius*), red fescue (*Festuca rubra*), black knapweed (*Centaurea nigra*), oxeye daisy (*Leucanthemum vulgare* Lam.), hairy tare (*Vicia hirsute*), oak saplings (*Quercus robur*), red clover (*Trifolium pratense*), ribwort plantain (*Plantago lanceolata*), smooth hawkbit (*Leontodon saxatilis*), ragwort (*Jacobaea vulgaris*), creeping thistle (*Cirsium arvense*), black medic (*Medicago lupulina*), field horsetail (*Equisetum arvense*), clustered dock (*Rumex conglomeratus*), hogweed (*Heracleum sphondylium*) and germander speedwell (*Veronica chamaedrys*) (**Photographs 1 & 2**).
- 7.2.2** Scattered trees and scrub were situated along the western edge of the field, separating it from residential gardens, with species present including ash (*Fraxinus excelsior*), sycamore (*Acer pseudoplatanus*), hawthorn (*Crataegus monogyna*), nettle (*Urtica dioica*), bramble (*Rubus fruticosus* agg.), hazel (*Corylus avellana*), bracken (*Pteridium* sp.), oak (*Quercus robur*) and red robin (*Photinia x fraseri*) (**Photographs 3 & 4**).



Photograph 1. Cut section of other neutral grassland (g3c).



Photograph 2. Other neutral grassland off-site to the east (g3c).



Photograph 3. Scattered trees and scrub along the western application site boundary.



Photograph 4. Scattered trees and scrub along the western application site boundary.

7.3 h2a – Native hedgerow & 33 Tree line

32 Scattered trees

- 7.3.1** A native hedgerow with scattered trees was situated along the southern application site boundary. The hedge was dominated by blackthorn (*Prunus spinosa*) with occasional hawthorn (*Crataegus monogyna*), cherry (*Prunus* sp.), sycamore (*Acer pseudoplatanus*), oak (*Quercus robur*) and bramble (*Rubus fruticosus* agg.). The vegetation growing at the base of the hedge included cock's-foot (*Dactylis glomerata*), couch (*Elymus repens*), ivy (*Hedera helix*) and nettle (*Urtica dioica*) (**Photograph 4**).
- 7.3.2** A tree line separated the existing school grounds from the field along the northern site boundary. The tree and shrub species included hornbeam (*Carpinus betulus*), oak (*Quercus robur*), holly (*Ilex aquifolium*), hawthorn (*Crataegus monogyna*) and bramble (*Rubus fruticosus* agg.) (**Photograph 5**).



Photograph 5. Scattered trees and scrub along the western application site boundary.



Photograph 6. Tree line along the northern application site boundary.



Figure 1. UKHab Survey Plan

8 DISCUSSION

8.1 Designated Sites

Evaluation of Baseline

- 8.1.1** The desk study revealed that the application site is not statutorily or non-statutorily designated for its wildlife interest and therefore not currently recognised as being of international, national or county level conservation significance. However, the site does fall within Impact Risk Zones (IRZ) for the Heath Lake and Longmoor Lake Sites of Special Scientific Interest (SSSI) situated approximately 2550m southeast and 2820m southwest respectively.

Impact Assessment

- 8.1.2** The proposals (i.e. creation of a sports pitch) do not correspond with the categories of development that are likely to have an impact on the nearby SSSIs and so consultation with Natural England will not be required as impacts on the SSSIs is highly unlikely. Furthermore, considering the nature, scale and distance of the proposals, no adverse effects are anticipated on the locally designated sites, which are more than 830m from the site.

8.2 Habitats

Evaluation of Baseline

- 8.2.1** The survey site is entirely grassland (g3c other neutral grassland) with native hedgerows, scattered trees and tree lines along the southern, western and northern boundaries respectively – i.e. habitats of low to medium distinctiveness. The grassland within the site had been cut recently, while the remainder of the field had not been recently cut and therefore had tall, but relatively uniform sward dominated by coarse grasses typical of nutrient rich soils and was relatively species poor. Aerial photography available on Google Earth suggests that the grassland has been subject to regular cutting over the last 20 years and does not have the characteristics of Lowland Meadow Priority Habitat (as defined under the NERC Act 2006) and is assessed to be of no more than site level ecological value.

- 8.2.2** The native hedgerow with trees, was formed of a range of native woody species and therefore meets the definition of Hedgerow Priority Habitat (as defined under the NERC Act 2006). Furthermore, parcels of mixed priority woodland do border the field that the application site forms part of to the northeast and north.
- 8.2.3** The tree line on the northern boundary and scattered trees with patchy scrub on the western boundary with neighbouring houses comprised mature and semi-mature native trees; none of the trees had features typical of veteran trees. The trees lacked visible potential bat roost features although those on northern tree line had some dead wood visible and therefore it is possible that these offered potential roost features that were not visible from ground level, particularly features suitable for individual bats.

Impact Assessment

- 8.2.4** The proposals will not result in the loss of any priority habitats or habitats of importance beyond the site level. The proposed development will need to demonstrate a minimum of 10% net gain for biodiversity (refer to separate Biodiversity Net Gain Assessment (R3008_BNG_a)).
- 8.2.5** Furthermore, no impacts to the native hedge or offsite habitats, such as the nearby mixed priority woodland, are anticipated as these are distant from the construction area and will be retained post development. Precautions are recommended to avoid pollution, which could impact the hedge and off-site habitats – refer to **Sections 9.2 & 9.3**.

8.3 Bats

Evaluation of Baseline

- 8.3.1** Eight bat mitigation licences have been granted within the last 10 years inside a 2-kilometre radius of the application site, covering licensable works affecting four different species. The closest license to have been granted is for the damage and destruction of a common pipistrelle (*Pipistrellus pipistrellus*) non-breeding roost at a residential site approximately 1430m north. This has been confirmed by TVERC's data which contains recent records of at least seven bat species with the closest being 170 metres to the west.

- 8.3.2** The application site offers suitable commuting and foraging opportunities for bats roosting locally but is unlikely to be an important resource for bat populations in the wider area given the proximity of nearby parcels of woodland and railway line, and other tree lined fields. None of the scattered trees present on site had any visible potential bat roosting features, although some of the more mature trees on the northern boundary had some dead wood and therefore it is possible these had potential roost features not visible from the ground, although such roosts would most likely be those suitable for individual bats i.e. PRF-I (Collins 2023).

Impact Assessment

- 8.3.3** The proposals will not involve the removal of any trees or native hedgerow along the northern, western and southern boundaries, which are the habitats likely to be of highest ecological value for bats on-site.
- 8.3.4** The proposals will not include floodlighting of the pitch. Therefore, the proposals will not have an adverse on bat feeding or commuting activity.
- 8.3.5** The proposals include some short sections of 6.5m high ball stop netting behind the rugby posts. Netting can have an adverse effect on bats and birds by obstructing flight paths and posing a potential entanglement risk; however, the two sections of netting proposed are short (c. 17m long) and situated on a boundary with occasional trees to the rear of the houses, so the risk of impact is low; however, a larger mesh size and netting under tension would mitigate the risk (refer to recommendations in **Section 9.4**)

8.4 Hazel Dormouse

Evaluation of Baseline

- 8.4.1** The desk study data included no recent hazel dormouse records within a 1 kilometre radius of the application site and a search of MAGIC for granted EPS licence applications returned none within a 10km radius.
- 8.4.2** The native hedgerow on the southern boundary does not offer habitat of high value for dormice and the site lacks the scale and connectivity to support a population of this species. The hedgerow is not connected to potentially suitable offsite hedgerows or woodland in the vicinity of the

application site. Therefore, the presence of hazel dormouse on site is considered highly unlikely.

Impact Assessment

- 8.4.3** The likelihood of hazel dormouse presence on site is extremely low and therefore no adverse effects on this species are anticipated.

8.5 Great Crested Newt (and other amphibians)

Evaluation of Baseline

- 8.5.1** The desk study data included six recent records for great crested newt (GCN), the closest of which is situated approximately 600 metres to the northeast. No other notable amphibian species were found within the search radius, and no European Protected Species (EPS) mitigation licenses or class licence survey returns for GCN have been returned within a 1km radius of the application site.
- 8.5.2** Whilst there are no waterbodies present onsite, mapping shows there are four waterbodies within 500m of the site: situated approximately 210m north (a small pond within the school's grounds), 255m southeast, 295m southeast and 370m southeast of the application site boundary; the core terrestrial habitat zone for great crested newts (GCN) (*Triturus cristatus*) around breeding ponds is a 250m radius (Langton *et. al.* 2003). The application site falls within an amber impact risk zone for GCN. The grassland on site was cut at the time of the survey and historic aerial photography shows it has been managed grassland with cutting throughout that period, which makes the site of low suitability for GCN.

Impact Assessment

- 8.5.3** Based on the assumption that the nearby surrounding waterbodies all support breeding GCN, the Natural England GCN Rapid Risk Assessment Tool was used to assess the risk of the development proposals adversely affecting GCN. The tool demonstrates that the loss of or damage to 1 – 5 ha of land within 100 – 250m of and greater than 250m from any breeding

ponds is likely to result in an offence – see **Figure 2** below

Component	Likely effect (select one for each component; select the most harmful option if more than one is likely; lists are in order of harm, top to bottom)	Notional offence probability
Great crested newt breeding pond(s)	No effect	0
Land within 100m of any breeding pond(s)	No effect	0
Land 100-250m from any breeding pond(s)	1 - 5 ha lost or damaged	0.4
Land >250m from any breeding pond(s)	1 - 5 ha lost or damaged	0.04
Individual great crested newts	No effect	0
		Maximum:
		0.4
Rapid risk assessment result:	AMBER: OFFENCE LIKELY	

"**Amber: offence likely**" indicates that the development activities are of such a type, scale and location that an offence is likely. In this case, the best option is to redesign the development (location, layout, methods, duration or timing; see **Non-licensed avoidance measures tool**) so that the effects are minimised. You can do this and then re-run the risk assessment to test whether the result changes, or preferably run your own detailed site-specific assessment. Bear in mind that this generic risk assessment will over- or under-estimate some risks because it cannot take into account site-specific details, as mentioned in caveats above. In particular, the exact location of the development in relation to resting places, dispersal areas and barriers should be critically examined. Once you have amended the scheme you will need to decide if a licence is required; this should be done if on balance you believe an offence is reasonably likely.

Figure 2. Natural England GCN Rapid Risk Assessment Tool.

8.5.4 The generic risk assessment tool also does not consider site specific factors, and in this instance, the development area primarily comprises regularly cut grassland, a suboptimal terrestrial GCN habitat. Furthermore, the small pond within the school grounds to the north i.e. the pond within 250m, is unlikely to be suitable to support a great crested newt population (the tool indicates that loss of up to 5ha of land more than 250m from breeding ponds would be unlikely to result in an offence). Therefore, the site-specific risk of the loss of this area on local GCN populations and individual newts is considered to be negligible. However, there is a small residual risk of harming individual newts during the proposed work. This risk can be mitigated by taking precautionary non-licensed reasonable avoidance measures, which will prevent the contravention of legislation protecting this species – refer to **Section 9.5**.

8.6 Reptiles

Evaluation of Baseline

8.6.1 The desk study data included recent records of slow-worm (*Anguis fragilis*) and grass snake (*Natrix helvetica*) at a site approximately 680 metres from the boundary of the application site. The site provides poor reptile habitat currently i.e. regularly cut grassland, and has a history of agricultural management through cutting, and therefore it is unlikely that the site provides habitats that would support a reptile population. However, common

and widespread reptile species, such as the locally recorded slow-worm and grass snake could opportunistically cross the site if present in neighbouring habitats.

Impact Assessment

- 8.6.2** The likelihood of reptiles being on site is low. The small residual risk of harming reptiles that could cross the site could be mitigated by adopting precautionary reasonable avoidance measures to prevent the contravention of legislation protecting common and widespread reptile species such as slow worm and grass snake that could be in the neighbouring habitats – refer to **Section 9.5**.

8.7 Birds

Evaluation of Baseline

- 8.7.1** The desk study data included recent records of twenty-one protected and/or notable bird species within a 1-kilometre radius of the application site, the closest of which situated within the parcel of woodland approximately 310 metres to the northeast of the application site.
- 8.7.2** The hedgerow, scattered trees and tree line across the boundaries of the site provide foraging opportunities and some suitable nesting opportunities for common and widespread bird species, such as the locally recorded house sparrow (*Passer domesticus*) but in the context of extensive farmland and woodland habitats offsite within the nearby area, the regularly cut other neutral grassland habitat on site is unlikely to support a bird assemblage of conservation importance.

Impact Assessment

- 8.7.3** The scattered trees and native hedgerow are to be retained. As such, impacts on active bird nests are unlikely, but if any remedial tree work or shrub or tree removal is required, a precautionary method of working would ensure compliance with legislation protecting nesting birds – refer to **Section 9.6**.

8.8 Badgers (and other mammals)

Evaluation of Baseline

- 8.8.1** The desk study data included twenty-eight recent records of badger; however, no evidence of badger activity (i.e. setts, trails, snuffle holes or mammal diggings) were visible within the application site. Therefore, the presence of badger on site is considered highly unlikely.
- 8.8.2** The hedgerow and scattered scrub along the southern and western boundaries may provide some suitable forage and shelter for other mammal species such as the locally recorded hedgehog (*Erinaceus europaeus*) across the application site.

Impact Assessment

- 8.8.3** The risk of badgers being on the development site is very low and therefore no adverse effects are expected. In addition, the hedgerow and trees to the will be retained.
- 8.8.4** The risk of significant impact on hedgehogs and their habitat is low; however, there is a small risk that they could be found onsite. As such, precautions should be taken (**refer to recommendations in Section 9.5**)

8.9 Invertebrates

Evaluation of Baseline

- 8.9.1** The desk study data included forty-three recent records of stag beetle, the closest of which situated approximately 270m from the site boundary. This species may utilise areas of woody vegetation nearby and could be associated with the hedgerow, scattered trees and tree line along the southern, western and northern boundaries of the application site. Overall, the site, which was relatively species poor, is unlikely to be of value to invertebrate populations beyond the scale of the site.

Impact Assessment

- 8.9.2** Whilst the proposals are unlikely to have an adverse impact on populations of invertebrates of conservation importance that have been locally recorded,

there would be scope to provide new habitats for notable species - refer to recommendations in **Section 9.7**.

9 RECOMMENDATIONS

9.1 Overview

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

9.2 Habitats

- 9.2.1** All construction activities must comply with up-to-date pollution prevention guidelines and environmental protection legislation to mitigate impacts on surrounding habitats through ground disturbance, surface water flow, dust and chemicals.

9.3 Habitat Protection Measures

- 9.3.1** The scattered trees, tree lines and priority hedgerow on-site as well as the mixed woodland off-site to the north and northeast should be protected during construction. The following protection measures are likely to be appropriate:
- Erection of tree protection fencing in advance of construction activities, enclosing Root Protection Areas (RPAs) (to be guided by arboricultural specialist); and
 - Prohibition of construction activities, material storage, use of vehicles, fires etc. within the fenced RPAs to prevent damage to tree roots and soil compaction.

9.4 Bats

Lighting

- 9.4.1** During construction, artificial lighting should be avoided, but if essential, it should be kept to a minimum and controlled by passive infrared motion sensors so that it operates only when necessary.

Ball stop fencing

- 9.4.2** The sections of ball stop netting proposed behind the rugby posts are unlikely to have a significant impact on bats or birds, but the mesh should be

large (100mm – 200mm) to avoid entanglement risk and to enable birds to pass through, and the netting should be tightly fitted.

9.5 Amphibians, Reptiles and Small Mammals (Reasonable Avoidance Measures)

9.5.1 The following reasonable avoidance measures should be adopted to minimise the low risk of harming individual GCNs, reptiles and small mammals:

Pre-commencement of construction activities

- Any removal of scrub and woody debris should be carried out using hand held tools and the area carefully searched for amphibians, small mammals and reptiles; and
- The grassland should be kept short around the construction site up until the commencement of construction to minimise the likelihood of small wildlife being present during excavations.

During construction activities

- Any stored building materials or waste, such as bricks or debris etc., that might offer shelter for amphibians, small mammals and reptiles will be kept raised off the ground on pallets or on existing hard standing, and efforts should be made to process and removed from site as soon as possible; and
- Excavation works will be avoided after dusk and any open excavations or trenches will be backfilled (after a check for amphibian/mammal/reptile presence) or left with escape ramps to prevent amphibians and reptiles from becoming trapped.

9.5.2 In the unlikely event that a GCN, small mammal or reptile is found during the course of construction, works will stop immediately, and a licensed ecologist will be called onto site to ensure the animal is not harmed and to provide further advice on how to proceed; work will recommence only once further written advice has been received.

9.6 Nesting Birds

- 9.6.1** If the removal of any trees or shrubs is necessary this 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.

9.7 Biodiversity Enhancement Measures

- 9.7.1** The application is to be accompanied by a separate Biodiversity Net Gain (BNG) metric; however, in addition to the BNG specific habitat requirements, the planning proposals provide additional 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 Planning Policy Framework (NPPF) and local planning policy:

- *Creation of stag beetle loggeries.*
- *Creation of rockeries to provide cover for small species e.g. great crested newt;*
- *Wildlife-friendly, native landscaping; and*
- *Tree-mounted woodcrete bat and bird boxes*

10 REFERENCES

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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.

Badgers

Badgers are protected by the Protection of Badgers Act 1992. The Act makes activities such as development that would harm or disturb badgers or damage, obstruct or destroy their setts illegal. If badgers are to be affected by the proposed development, activities can be undertaken only under a licence issued by Natural England.

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 otter.

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

APPENDIX 2 –PROPOSED SITE PLAN

