

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	260746
Address:	Plot B, Lot 4,, Eversley Road,, Arborfield,, Reading.		
Proposal:	Full application for the change of use of land to a gypsy and traveller site to allow the stationing of two residential caravans for occupation, with associated access and residential use.		
Type of Development:	Minor Dwellings (1-9)		
Site Visit Made:	Yes/No – 24 th March		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☒ Request further information before determination as **stated below**
- ☒ Objection due to the reason(s) **stated below**

Comments On Proposal

Documents reviewed:

- Great crested newt Statement, January 2026 by Stuart Carruthers
- Badger Survey Statement, January 2026 by Stuart Carruthers
- Habitats Plan, 15th December 2025 2025 by Unknown (using OS Maps)
- Block Diagram, 15th December 2025 by Unknown (using OS Maps)
- Location Plan, unknown, using Planning Portal.
- Statutory Metric Tool, 15th December 2025 by Stuart Carruthers
- Arboricultural Statement (No Trees Present), no date by unknown.

Context

The proposed application relates to the change of use of land to residential use to accommodate two static caravans. A site visit was undertaken to establish an overview of the site context and existing land cover; however, detailed UK Habitat Classification surveys and condition assessments were not undertaken as part of this visit. The site comprises an access track with intermittent vegetation, interspersed with areas of concrete hardstanding, previously disturbed land, open mosaic habitat, neutral grassland, and a ditch running along the north-eastern boundary. The proposed location of the static caravans, as shown on the Block Diagram (15th December, Unknown) and reviewed against aerial imagery (Figure 1) lies within an area comprising grassland, scattered trees and scrub. During the site visit, a wet ditch was also recorded adjacent to the northern boundary of the access track, confirming the presence of a water feature within the site.

Biodiversity Net Gain

The applicant's ecologist has submitted a Habitats Plan and Small Sites Metric which classify the access route as hardstanding. However, based on the LPA site visit and supporting photographs, the access track is not considered to comprise sealed hardstanding and is more appropriately characterised as urban derelict land/open mosaic habitat under the UKHab Classification system. Vegetation is clearly present throughout and alongside the track, as well as within the area proposed for the static caravan. As such, the baseline habitat classification is not accepted.

The submitted habitat information is also inconsistent across the application documents. The Habitats Plan identifies approximately 1,410m² of "hardstanding" associated with the access road, 650m² of scrub, and a further 1,400m² area comprising modified grassland, bare ground, and hardstanding. However, within the submitted metric, this same 1,400m² area is categorised as derelict land rather than modified grassland and bare ground. The metric further describes the habitat as being predominantly "hardstanding", despite the LPA site visit on 24 March confirming the area is primarily long sward grassland (Photos 1-3). No photographic evidence, UKHab survey data, or justification has been provided to support the habitat classifications used by the applicant ecologist.

Further concerns arise from the metric's assumption that the 1400m² area of derelict land will be fully retained and enhanced, despite the proposed siting of a static caravans and associated infrastructure works. It is unclear how these habitats could realistically be retained in their existing condition whilst accommodating foundations, hardstanding, access improvements, and service connections.

Overall, the habitat classifications used within the metric appear to significantly underrepresent the site's existing biodiversity value. Habitats observed on site have been classified as hardstanding, derelict land or scrub despite site evidence indicating they are more accurately described as derelict land - open mosaic habitat, neutral/modified grassland, scrub and trees. These habitat types would generate measurable biodiversity units within the statutory metric, whereas the classifications selected within the submission create limited or no biodiversity value. In addition, the access track itself would likely require formal surfacing works to function as an operational access route, resulting in further habitat loss which has not been accounted for within the assessment.

The submitted metric also fails to include the watercourse ditch running alongside the access track, despite this feature falling within the red line boundary and being likely to experience direct impacts from access and construction activities.

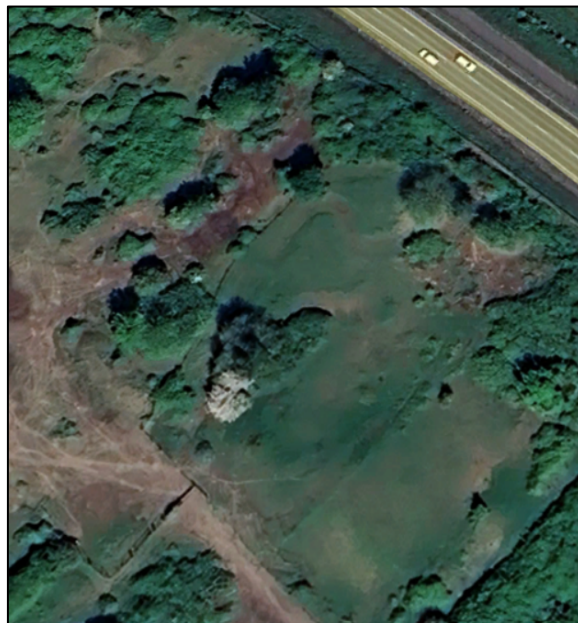
No Preliminary Ecological Appraisal (PEA) has been submitted to identify ecological constraints or establish appropriate mitigation and protection measures for retained habitats, including scrub, derelict land/open mosaic habitat, and the watercourse corridor. Consequently, the application fails to demonstrate how retained habitats would be protected during construction or managed in the long term.

The submitted metric therefore fails to demonstrate compliance with the statutory biodiversity requirements of the Environment Act 2021. The baseline habitat classifications are inconsistent, unsupported by survey evidence, and do not provide confidence that the site's pre-development biodiversity value has been accurately assessed in accordance with the statutory biodiversity metric and UKHab guidance.

Accordingly, the submitted metric and habitat information are considered inadequate and contrary to best practice guidance. A revised submission prepared by a suitably qualified ecologist is required, supported by a detailed UKHab survey, habitat condition assessments, photographic evidence, and clear justification for all habitat classifications applied. The revised metric should accurately reflect the habitats present on site, realistically assess habitat losses and retention, and provide appropriate biodiversity enhancement measures.

Similarly, the submitted arboricultural information cannot be accepted. The arboricultural plan states that there is no vegetation present on site, which directly conflicts with site photographs and aerial imagery showing the presence of trees and vegetation within the application boundary. The report also fails to identify an author, survey date, methodology, or supporting plans and photographic evidence. Consequently, insufficient information has been provided to robustly assess arboricultural impacts.

Figure 1: Google aerial imagery dated 2025 which clearly shows the presence of trees and vegetation.



Photographs 1-3 (left-right) from site visit 24th March 2026

Photograph 1: Access track looking north

Photograph 2: tree, scrub and grassland northeast of access track

Photograph 2: grassland, scrub and trees northeast of access track



Protected Species

The applicant has not submitted a full Preliminary Ecological Appraisal (PEA) assessing the impacts of the proposed development on biodiversity or identifying the precautionary and mitigation measures necessary to ensure compliance with relevant legislation and national planning policy. This is contrary to the British Standard *BS 42020:2013 Biodiversity – Code of Practice for Planning and Development*. Instead, the ecological information provided is limited to separate badger and great crested newt (GCN) reports, which do not provide a comprehensive assessment of protected and priority species or habitats present on site.

No precautionary measures or mitigation strategy have been provided in relation to the habitats proposed to be retained within the development, including areas of scrub and derelict land. Furthermore, the submitted information fails to assess or address potential impacts on breeding birds, reptiles, amphibians, hedgehog, water vole and other protected or priority species that may be associated with these habitats. This is of particular concern given that some reptile species and hedgehog are recognised Species of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006.

A full Preliminary Ecological Appraisal is therefore required to establish an ecological baseline for the site, identify protected and priority species constraints, assess the likely impacts of the development, and set out appropriate avoidance, mitigation and enhancement measures. In the absence of this information, the Local Planning Authority cannot be satisfied that the proposal would comply with relevant biodiversity legislation, the mitigation hierarchy, or local and national planning policy, and the application cannot therefore be supported on ecological grounds.

Thames Basin Heath, Special Protection Area (SPA).

This proposed development is located within the 5 km linear mitigation zone for the Thames Basin Heath Special Protection Area (SPA), a nationally designated site. In accordance with Policy CP8 – Thames Basin Heath of the Wokingham Core Strategy, the proposed increase of two additional dwellings must be appropriately

assessed and provide a financial contribution toward the maintenance and protection of the SPA.

Paragraph 4.49 of Policy CP8 states:

*“The Appropriate Assessment indicates that to ensure development avoids likely significant impacts upon the SPA, the following principles will apply:
i) Dwellinghouses and other residential development (including staff accommodation in Use Class C2) must provide avoidance and mitigation measures where:*

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

As per Policy CP8 of the Wokingham Core Strategy, which calculates the amount of Suitable Alternative Natural Greenspace (SANG) provision required for residential development, the proposal would require 0.0384 ha of SANG capacity, together with a Strategic Access Management and Monitoring (SAMM) contribution.

The applicant will therefore be required to provide a financial contribution toward the purchase and maintenance of capacity within an existing Suitable Alternative Natural Greenspace (SANG), to be managed in perpetuity as an alternative recreational resource to the SPA. In addition, a contribution toward Strategic Access Management and Monitoring (SAMM) will also be required.

These contributions will be secured through a Section 106 Agreement.

Conditions & Reasons (if required)			
N/A			
Date:	13.05.26	Signed:	L.Aparo