

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	251912
Address:	Silver Birches, Heath Ride, Finchampstead, Wokingham, RG40 3QJ.		
Proposal:	Full application for the proposed erection of 1 no. detached dwelling with 2 no. carports, front wall and entrance gates and associated landscaping, following demolition of the existing dwelling and outbuildings.		
Type of Development:	Minor Dwellings (1-9)		
Site Visit Made:	Yes/No		

Summary Of Recommendations

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

Comments On Proposal

Documents reviewed in support of this application;

- Preliminary Ecological Appraisal, July 2025 by Dr. Jonty Denton
- Phase 2 Bat Emergence Survey, July 2025 by Dr Jonty Denton
- Planning Drawings (East, West, Rear and Front elevations), 21/07/25 by The Keen Partnership

Biodiversity Net Gain (BNG)

I agree with the applicant's assessment of baseline habitats. This proposed development is exempt for the Statutory BNG, as it qualifies as a 'self-build, meeting all criteria; consist of no more than 9 dwellings, on a site no larger than 0.5ha and consist exclusively of self-build dwellings.

As this is proposed development is exempts from Statutory Biodiversity Net Gain, it does not have to provide a 10% net gain of habitat and hedgerow units on site.

Bats

I agree with the application ecologist's assessment that the site itself has negligible potential for roosting bats. However, the on-site treeline that connects to the deciduous woodland to the north provide suitable conditions for bats, functioning as

an important wildlife corridor connecting surrounding areas of priority woodland habitat.

Given that the adjacent connecting woodland offers foraging, commuting, and potential roosting opportunities, a Lighting Plan will be required to ensure that these habitats are not adversely affected by artificial lighting associated with the proposal. Bats are European Protected Species, protected under the Conservation of Habitats and Species Regulations 2017. It is an offence to kill, injure, or disturb bats, or to damage or destroy their breeding or resting sites. In line with national guidance and Policy CP7 – Biodiversity of the Wokingham Core Strategy, developments that may impact species of principal importance—such as bats—must include appropriate mitigation measures. In this instance, for appropriate mitigation, a detailed lighting plan will be required.

The applicant should submit a Lighting Plan detailing the location, type, and specification of all proposed lighting. This plan should follow the *Bat Conservation Trust Guidance Note 08: Bats and Artificial Lighting*. It is recommended that a

Reptiles

All native reptile species are legally protected under the Wildlife and Countryside Act 1981 and are listed as priority species under Section 41 of the Natural Environment and Rural Communities Act 2006.

I disagree with the applicant ecologist's assessment that the site has negligible potential for reptiles. Although the site has been recently cleared, it provides potential basking opportunities and is functionally connected to suitable habitat, including adjacent deciduous woodland—a priority habitat. The site also lies approximately 340m southeast of a lowland heath, a recognised reptile habitat. Between the heath and the site, there is only a main road, a narrow strip of residential properties, and intervening open land that could act as a dispersal corridor. It is therefore reasonable to conclude that reptiles could potentially utilise the site.

However, while the wider landscape supports higher-quality reptile habitat, the site's recent clearance and the limited scale of the proposed development suggest that a full presence/absence survey would be disproportionate.

In accordance with Wokingham Core Strategy Policy CP7: *Biodiversity*, where development may directly or indirectly impact species of principal importance, planning permission should only be granted if appropriate mitigation measures are secured to prevent harmful effects. Additionally, under the Habitats Directive Annexes, maintaining the favourable conservation status (FCS) of reptiles is a key legal requirement.

Therefore, I accept that a detailed reptile mitigation strategy to maintain FCS could appropriately be secured through a planning condition. Accordingly, I recommend a Reptile Method Statement condition to ensure FCS is maintained in accordance with both national and local policy.

Birds

I agree with the applications assessment that the site provides nesting potential for breeding birds. Under the Wildlife and Countryside Act 1981, it is a criminal offence to remove, damage or destroy the nest of any wild bird and their eggs. The PEA does not state that any trees or vegetation is to be removed for this proposed development. To ensure policy compliance with national legislation, I recommend a Protection of Breeding bird's condition. This is to ensure that any nesting birds are not impacted by the development by works taking place outside of nesting season, or if that is not possible, having an ecologist to carry out an inspection prior to vegetation removal.

Wokingham Policies

The Preliminary Ecological Appraisal (PEA) does not specify any biodiversity enhancements, nor are any shown on the submitted plans, including the House Front Elevation, East Neighbour Side View, House West Site Elevations, and Rear Elevation plans.

Policy TB23: *Biodiversity and Development* of the Wokingham Borough Development Plan states that planning permission will only be granted where proposals comply with Policy CP7: *Biodiversity* of the Core Strategy and demonstrate how they:

*“a) Provide opportunities, through design, layout, and landscaping, to incorporate new biodiversity features or enhance existing ones;
b) Provide appropriate buffer zones between development proposals and designated sites, as well as habitats and species of principal importance for nature conservation; and
c) Ensure that all existing and new developments are ecologically permeable by protecting existing and providing new continuous wildlife corridors, integrated with the wider green infrastructure network”.*

To ensure compliance with Policy TB23, I recommend the incorporation of biodiversity enhancements within the proposed development. Specifically, the installation of bat and bird boxes would meet the requirements of paragraph (a) by introducing new biodiversity features. In addition, the creation of hedgehog highways would maintain ecological permeability across the site, supporting paragraph (c) and facilitating wildlife movement and foraging. I recommend securing these enhancements with a species compensation and enhancement condition.

Protected Species

All other protected species listed within the Preliminary Ecological Appraisal and Preliminary Roost Assessment do not pose any concerns.

Conditions & Reasons (if required)

Lighting design strategy for light-sensitive biodiversity – Condition

Prior to occupation, a “lighting design strategy for biodiversity” for buildings, features or areas to be lit shall be submitted to and approved in writing by the local planning authority. The strategy shall:

- a. identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding

sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

- b. show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority

Reason: To policy compliance with national legalisation Wildlife and Countryside Act 1981, Conservation of Habitats and Species Regulations 2017 and Wokingham Core Strategy, Policy CP7.

Protection of Breeding Birds During Construction Condition

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

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

Reptile method statement

No development shall take place (including any demolition, ground works, site clearance) until a method statement for reptiles has been submitted to and approved in writing by the local planning authority. The content of the method statement shall include the:

- a) purpose and objectives for the proposed works;
- b) detailed design(s) and/or working method(s) necessary to achieve stated objectives (including, where relevant, type and source of materials to be used);
- c) extent and location of proposed works shown on appropriate scale maps and plans;
- d) timetable for implementation, demonstrating that works are aligned with the proposed phasing of construction;
- e) persons responsible for implementing the works;
- f) initial aftercare and long-term maintenance (where relevant);
- g) disposal of any wastes arising from works.

The works shall be carried out strictly in accordance with the approved details within 12 months and shall be retained in that manner thereafter.

Reason: To comply with national legalisation Wildlife and Countryside Act 1981, Section 41 of the Natural Environment and Rural Communities Act 2006 and Habitats Directive. Additionally to comply with Wokingham Core Strategy, Policy CP7: Biodiversity.

Species Compensation and Enhancement Condition

Condition: Prior to construction, a scheme for ecological permeability and biodiversity compensation and enhancement, such as the incorporation of two permanent bat roosting feature(s) per dwelling and access points for hedgehog to gardens, shall be submitted to and agreed in writing with the Local Planning Authority. The approved details thereafter shall be implemented, retained and maintained for their designed purpose in accordance with the approved scheme. The scheme shall include, but not limited to, the following details:

- a) Description, design or specification of the type of feature(s) or measure(s) to be undertaken;
- b) Materials and construction to ensure long lifespan of the feature/measure
- c) A drawing(s) showing the location and where appropriate the elevation of the features or measures to be installed or undertaken.
- d) When the features or measures will be installed within the construction, occupation, or phase of the development.

Reason: To ensure the development is policy compliant with regards to Policy TB23: Biodiversity and Development of the Wokingham Borough Development Plan

Date:	12/11/25	Signed:	L.Aparo
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