

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	252257
Address:	Ladds Garden Village, Bath Road, Hare Hatch, Wokingham, RG10 9SB.		
Proposal:	Full application for the proposed erection of 19no. dwellings with associated landscaping and access following demolition of existing buildings.		
Type of Development:	Major Dwellings (10+)		
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;

- Interim EcIA, Ref: PRI24715, 18.09.25 by ACD Environmental. Hereby known as 'EcIA'
- Statutory Biodiversity Metric Tool dated 8.09.25 by ACD Environmental. Hereby known as 'Metric Tool'.
- Arboricultural Impact Assessment, September 2025 by GHA Trees
- Flood Risk Assessment (Surface Water and Drainage Strategy) (Part 1 & 2). Project Number: 332611948, July 2025 by Stantec.

Statutory Biodiversity Net Gain

The application ecologist has described the baseline habitats on site, and I agree with the majority of the habitats categorised and conditioned except for the non-priority pond.

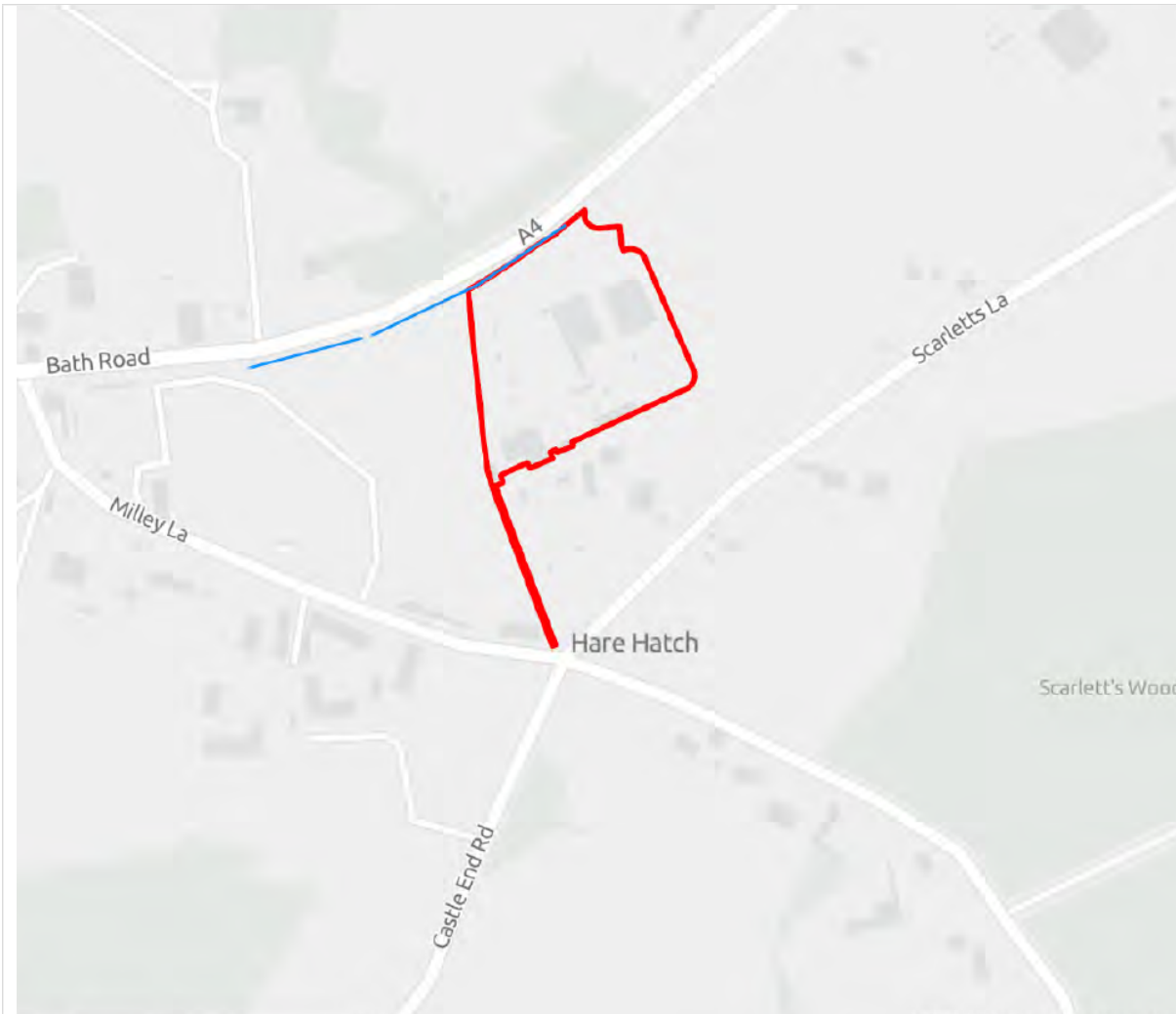
The non-priority pond has been classified as a non-priority pond due to 'low water levels despite the recent rainfall', an absent of standing water and abundance of reeds and vegetation. However, according to the UK Biodiversity Action Plan Priority Habitat Descriptions of Ponds by JNCC, a priority pond is permanent or seasonal body of water which supports "*Species of high conservation importance: Ponds supporting Red Data Book species, UK BAP species, species fully protected under the Wildlife and Countryside Act Schedule 5 and 8, Habitats Directive Annex II*

species, a Nationally Scarce wetland plant species, or three Nationally Scarce aquatic invertebrate species". For example, a body of water which supports a breeding population of common frog or common toad would be considered a priority pond. The survey was conducted outside the amphibian breeding season, making it difficult to determine whether this qualifies as a priority pond. Furthermore, the Priority Pond Assessment Survey by Freshwater Habitats Trust was not used to survey the pond to aid justifying classification of the pond. Using the Freshwater Habitats Trust Priority Pond Assessment Calculator, the available ruderal data from the EcIA were entered. Although several inputs were necessarily estimates, the results indicated that the pond would be classified as a priority pond.

There is an inconsistency between the EcIA and the Biodiversity Metric Tool regarding the proposed tussock grass mix. The EcIA describes this habitat proposed to be in 'good-condition' modified grassland, while the Metric Tool classifies it as 'moderate condition'. The EcIA should therefore be updated to align with the Metric. I agree that 'moderate condition' is the more realistic classification, as the grassland will be accessible to local residents and is likely to experience poaching and general wear.

In addition, Google Street imagery and drawings from other disciplines indicate the presence of a ditch along the northern site boundary, used for water discharge. This feature is not referenced in either the EcIA or the Metric Tool. If the ditch lies within or immediately adjacent to the development boundary, and construction activities could affect it, it must be accounted for within the Biodiversity Metric

Figure 1: Boundary of site and ditch, provided by the Drainage Report.



In summary, baseline habitats cannot be determined without further pond surveys to justify its classification. Amendments to the EclA and the Metric Tool are required to ensure consistency between the report and metric tool and the northern ditch will also need to be appropriately accounted for.

From the information provided within the EclA and Metric Tool, the proposed development's strategy for meeting the statutory requirement of at least a 10% net gain in habitat and hedgerow units is evident. A large proportion of the net gain is due to the on-site creation/planting of 52 small native trees in moderate condition, proposed moderate condition of modified grassland and woodland enhancement and condition uplift from 'poor' to 'moderate'. To ensure the proposed trees and habitats are maintained in moderate condition for 30 years, details of management and monitoring will need to be secured through a Habitat Management and Monitoring Plan (HMMP). I recommend a planning obligation is applied to secure monitoring of the proposed biodiversity on-site net gain measures as agreed in the HMMP.

The Metric Tool indicates that trading standards have not been met due to the loss of medium distinctiveness habitat 'rural trees' and will require third-party offsetting using BioFarm. I recommend securing the BNG offsetting with a planning obligation of a section 106 agreement.

Great Crested Newts

The application site is located within a red zone for great crested newts. Although the application ecologist does suggest mitigation measures for great crested newts, nevertheless NatureSpace will require consultation.

Bats

The application ecologist from ACD Environmental has provided clear photographic evidence and justification on the roosting potential of the buildings on site. B2 and B5 were categorised as having low (B2) and moderate roosting potential (B5) and emergence surveys were undertaken between May- September 2025 by AAE. AAE have provide clear evidence of appropriate surveying undertaken to indicate that there are no roosting bats on site and corroborate the roosting potential of the other remaining buildings and vegetation on site. I can recommend from both the Potential Roost Assessment Survey by ACD Environmental and the emergence surveys by AAE that the development is unlikely to adversely affects the local bat populations and the favourable conservation status of the species.

The EclA details that foraging and commuting within the application site is limited due to the security lighting and predominate hardstanding. This was supported by AAE emergence surveys results which indicate only few pass overs across the site by common pipistrelle species. Nevertheless, the on-site woodland would provide some foraging and commuting opportunity to the off-site neighbouring eastern hedgerows and western neighbouring open space parcel of land. As such ACD Environmental have suggested appropriate mitigation measures to reduce constructional impacts on commuting and foraging bats, these mitigation measures focus predominantly on controlled lighting and appropriate working hours. I agree with the mitigation measures and recommend they be secured by a Construction Environmental Management Plan: Biodiversity to ensure this mitigation measures suggested are adhered to.

The CEMP: Biodiversity condition is necessary to ensure that this European protected species will not be injured or disturbed during the construction process of the development, relevant to national policy Conservation of Habitats and Species Regulation 2017.

A sensitive lighting plan is required to ensure the development does not create long-term operational impacts on commuting or foraging bats. This is particularly important given the deciduous woodland to the west, a priority habitat used by roosting, foraging, and commuting bats. The application ecologist has recommended that the lighting strategy follow the Bat Conservation Trust and Institution of Lighting Professionals Guidance Note, and I agree with this approach.

Therefore, I recommend securing these mitigation measures by a Lighting Design Strategy condition, in line with this Lighting guidance note and as outlined in the EclA. This measure accords with Policy CP7: Biodiversity, which permits development affecting habitats or species of principal importance—such as deciduous woodland and bats—only where effective mitigation is provided. A sensitive lighting plan would deliver the necessary mitigation.

Amphibians & Reptiles

All common species of amphibian and reptile are protected under the Wildlife and Countryside Act (1981) as Amended, which makes an offence to intentionally injure or destroy a reptile. Moreover, common toad, common frog, slow worm and common lizard are among the list of herpetile species that are a national priority species, protected under Conservation of Habitats and Species Regulations 2017.

I disagree with the application ecologist's assessment of the site providing negligible suitable habitat for reptiles. As noted in the EclA, a presence/absence survey for reptiles was carried out in June 2021 on the neighbouring land adjacent to the western boundary, as part of a separate planning application. The survey recorded a single slow worm and concluded that the site was likely to support a small population. Additionally, the site itself was considered of good terrestrial habitat for amphibians, including great crested newts. Since then, Google Earth imagery indicates that the area has been managed and opened up, creating more grassland within the centre of the site while retaining boundary features. These changes may have improved reptile habitat quality by providing better basking opportunities.

The boundary features within the western parcel of land connect to the on-site woodland, which contains deadwood, a suitable foraging and hibernating habitat for reptiles. Additionally, the ditch, although not recorded within the baseline, runs alongside the northern boundary and would also provide a corridor for amphibians and reptiles. Although I agree that the habitats on site are not of optimal condition, as it connects to land that has been indicated to provide appropriate terrestrial habitat for amphibians and reptiles, I believe the application site provides commuting and foraging opportunity for reptiles and amphibians.

The application ecologist, however, does suggest precautionary measures for mitigation for amphibians including great crested newts, which can also be applied for reptile mitigation. I agree with the precautionary measures suggested specifically a phased vegetation clearance by hand, within March-October the active herpafauna season and the use of heras fencing to fence off this biodiversity zone. The precautionary mitigation measures provided are recommended to be secured as apart of the CEMP: Biodiversity Condition, which will follow the precautionary mitigation measures discussed in the EclA and provide further detail relating to period of works to take place.

Birds

The EclA references the sites suitability for nesting birds. All wild birds are protected under the Wildlife and Countryside Act making it illegal to disturb nesting birds and their eggs. The application ecologist has suggested suitable mitigation measures such as sensitive clearance outside of nesting season or an on-site EcOW to prevent harming nesting birds, which I recommend being secured with a planning condition, as apart of the CEMP: Biodiversity.

Protected Species

The proposed development raises concerns regarding potential impacts on amphibians, as the current survey effort does not adequately justify the habitat classification. All other protected species considered in the Interim EclA are not expected to be affected. The EclA recommends general precautionary measures—such as inspecting open trenches and avoiding spoil mounds—to prevent harm during construction. These measures should be set out in greater detail within the CEMP: Biodiversity, secured by planning condition.

Ecological Enhancements and Ecological Permeability

The EclA suggests the implementation of integrated biodiversity enhancements of bat boxes; a minimum of three bat boxes per dwelling, these enhancements are policy compliant with policy TB23: Biodiversity and Development within the Wokingham Borough Development Plan. The application ecologist has listed suitable biodiversity enhancements for the species to increase roosting suitability on site. I agree with the enhancements recommended and the amount recommend per dwelling. However, I believe an opportunity has been missed to increase roosting suitability within the onsite woodland and recommend the installation of a tree mounted bat box, similar to that of the Eco Kent Bat Box which is suitable for common crevice dwelling species. Tree mounted bat boxes should be mounted in groups of 2-3, to provide a variety of microclimates which increased uptake by the species, as recommend by Bat Conservation Trust - [Bat Box Information Pack May 2018\[1\]](#).

Inline with policy TB23: Biodiversity, the application ecologist recommends the implementation of integrated house sparrow bird boxes, which specifically supports the Wokingham Biodiversity Action Plan, but can still be utilised by other passerine birds.

As well as bat and bird boxes, the EclA reports the use of hedgehog highways to be implemented throughout the urban gardens to ensure wildlife permeability, complying with Policy TB23: Biodiversity and Development, paragraph C.

The EclA does reference the use of removed trees to be used as brash piled within the development site, which is a great enhancement for invertebrates, small mammals and reptiles. However, an opportunity has been missed to provide long-term enhancements for invertebrates and support the Wokingham BAP further by providing insect hotels and loggeries.

I recommend securing these biodiversity enhancements, both outlined within the EclA and the recommend tree mounted bat box and insect hotels/ loggeries with a Species Compensation and Enhancement condition.

Conditions & Reasons (if required)

A Habitat Management and Monitoring Plan (HMMP)

A HMMP shall be submitted to, and be approved in writing by, the local planning authority prior to the commencement of the development. The content of the HMMP shall include the following.

a) Description and evaluation of features to be managed.

- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organization responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The HMMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the HMMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To secure appropriate management for the on-site habitats in order to deliver the mandatory biodiversity net gain targets.

Construction Environmental Management Plans (CEMP):

Condition: No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs. The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority

Reason: To ensure mitigation measures for protected and priority species are appropriate and secured by local plan policy CP7 and TB23.

Species Compensation and Enhancement Condition

Condition: Prior to construction, a scheme for ecological permeability and biodiversity compensation and enhancement, such as the incorporation of integrated bat roosting feature(s) and bird boxes per dwelling, tree mounted bat boxes, access points for hedgehog to gardens, and insect hotels 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.

Lighting design strategy for light-sensitive biodiversity – Condition

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

- a. identify those areas/features on site that are particularly sensitive for bats and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and
- b. show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places. All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority

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

Date:	05.12.25	Signed:	L.Aparo
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