

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	253144
Address:	Dun Elms, Nelsons Lane, Hurst, Wokingham, RG10 0RE.		
Proposal:	Application for submission of details to comply with the following condition of planning consent 243193 dated 11/04/2025. Condition 5. Drainage System. 6. Landscaping. 7. Biodiversity Enhancements. 8. Horse manure storage. BNG Condition.		
Type of Development:			
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

BNG Condition

According to the location plan for the approved application 243193, the site consists of a red line boundary which encompasses the hardstanding and a blue line boundary, which indicates the off-site habitat to be enhanced. However, the gain plan submitted stipulates that only on-site enhancements have been required, but majority of enhancements such as the neutral grassland creation and planting of trees takes place within the off-site land, shown by the blue line.

Government guidance for the Statutory Biodiversity Gain stipulates that off-site land is land outside of the redline boundary, this includes any land within the blue line boundary. Additionally, the Biodiversity Gain Site Register Regulations 2024 stipulate that only after land has been entered into the biodiversity gain register can a section106 apply to secure enhancements. As it stands, no biodiversity gain reference number has been provided and the gain plan implies that all enhancements are taking place on site, when it's all located in the off-site blue boundary land. The land has not been registered under the Biodiversity Gain Site Register.

The applicant will need to register the land in the Biodiversity Gain Site Register and provide a reference number before this condition can be discharged.

Although the off-site land will first need to be registered on the Biodiversity Gain Site Register before the off-site land can be allocated to the development, there is one further issue to raise. The applicant proposes that the off-site area will achieve good-condition neutral grassland, which is a demanding target requiring a high density and diversity of indicator species per square metre. The applicant does provide clear justification on how it will reach the number of species per m² by appropriate management plan. However, as the proposed condition is a difficult condition to reach and secure, the applicant must explain how the habitat will be protected from recreational use and uncontrolled grazing, as these pressures would compromise the ability of the grassland to reach and maintain good condition. The HMMP should specify the proposed fencing type, layout, and access including how the area will be secured to prevent horse grazing outside the permitted period and to avoid erosion from informal recreational activity before the LPA can be confident that the target condition is achievable.

7. Biodiversity Enhancements.

The proposed landscaping plan provides the location of the biodiversity enhancements. The Ecological Appraisal submitted under 253144 provides prescriptions for the enhancements shown on the Proposed Landscaping Plan. As such this condition can be discharged.

Conditions & Reasons (if required)			
Date:	25/03/26	Signed:	L.Aparo