

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	260736
Address:	Land Off Eversley Road, adjacent to Highfield Park, Arborfield, Berkshire.		
Proposal:	Full application for the proposed change of use of land for the stationing of 1 no. static caravan for occupation by Gypsies / Travellers with associated access.		
Type of Development:	Minor Gypsy and traveller pitches (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, March 3026 by Harrison McAfee
- Block Plan, 10th December 2025 by Harrison McAfee
- Statutory Metric Tool, 22nd March 2026 by Stuart Carruthers

Context

The proposed application relates to the change of use of land to residential use to accommodate one static caravan. A site visit was undertaken to gain an overview of the site, although a detailed UK Habitat classification survey and condition assessments were not undertaken as part of this visit, the purpose was to understand the site context and existing land cover. The site comprises an access track with intermittent vegetation, interspersed with areas of concrete hardstanding, derelict land, open mosaic habitat, areas of neutral grassland and a watercourse ditch running the length of the northeastern boundary.

Biodiversity Net Gain

The applicant ecologist has submitted a Habitats Plan and Small Sites Metric which categorise the access route as hardstanding. However, based on the LPA site visit and the photographs below, the access track is clearly not hardstanding and would

be more accurately described as urban derelict land/open mosaic habitat under the UKHab Classification system. The photographs (below) clearly demonstrate the presence of extensive vegetation within and alongside the track, rather than a sealed hardstanding surface. Based on the submitted information I cannot agree the baseline.

Furthermore, the habitat information submitted is inconsistent throughout the application documents. The Habitats Plan divides the site into two areas: approximately 2,100m² of “hardstanding” and a separate area of 400m² identified as “derelict land”. However, the submitted metric categorises this same 400m² area as “bramble scrub” rather than derelict land. No justification or photographic evidence has been provided to support these habitat classifications, and the Habitats Plan itself does not identify any areas of bramble scrub despite the metric recording the habitat as fully retained.

The metric also states that the 400m² of ‘bramble scrub’ is to be fully retained. This raises further concerns regarding the accuracy and realism of the assessment, particularly as the proposed static caravan would be expected to require foundations, hardstanding, access arrangements and associated infrastructure. It is therefore unclear how the habitats identified within the metric can realistically be retained in their current condition whilst accommodating the proposed development.

It appears that the habitat categories used within the submitted metric have been deliberately selected to avoid the allocation of measurable Biodiversity Net Gain units. Habitats shown on site, particularly along the access track, have been classified as hardstanding or scrub despite site observations indicating that areas are more appropriately described as urban derelict land/open mosaic habitat under the UKHab Classification system. These habitat types would generate measurable biodiversity units within the metric, whereas the classifications chosen by the applicant ecologist provide little or no biodiversity value within the assessment. The inconsistent categorisation of the same areas across the Habitats Plan and metric further undermines confidence in the submission and suggests an attempt to minimise the site’s baseline biodiversity value in order to avoid the requirement to deliver meaningful Biodiversity Net Gain.

In addition, the submitted metric does not account for the watercourse ditch running alongside the access track, despite this feature falling within the red line boundary and being likely to experience indirect or direct impacts associated with access and construction works.

No Preliminary Ecological Appraisal has been submitted to identify ecological constraints or provide mitigation measures for the retention and protection of habitats such as bramble scrub, derelict land or the adjacent ditch habitat. The submitted information therefore fails to demonstrate how retained habitats would be protected during construction or managed in the long term.

The submitted metric fails to accord with the statutory requirements of the Environment Act 2021, which requires accurate assessment of the pre-development biodiversity value of onsite habitats using the statutory biodiversity metric. The submitted habitat classifications are inconsistent, unsupported by photographic

evidence or a UKHab survey, and do not provide confidence that the baseline habitat value has been correctly assessed.

Therefore, the submitted metric and habitat information are considered inadequate and do not follow best practice guidance, including the UKHab Classification system and statutory Biodiversity Net Gain requirements. The metric should be revised by a competent ecologist and supported by a detailed UKHab survey, habitat condition assessments, photographic evidence and clear justification for all habitat classifications used. The revised submission should accurately reflect the habitats present on site, realistically assess habitat retention and losses, and provide appropriate enhancement measures.

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, 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.

Site Photos from 24th March Visit (below)

Left to right: entrance of access track, mid section of access track and watercourse ditch alongside north-eastern boundary of access track.



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 one or more net 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 this proposal involves additional permeant residential development within the 5 km mitigation zone, the applicant will be required to provide a financial contribution toward the maintenance of existing Suitable Alternative Natural Greenspace (SANG), to be managed in perpetuity as an alternative recreational area to the SPA. In addition, a contribution toward Strategic Access Management and Monitoring (SAMM) will also be required.

Conditions & Reasons (if required)

Date:	08.05.26	Signed:	L.Aparo