

MEMORANDUM

From:	Duncan Fisher Ecology Officer		
Service	WBC Ecology	App No:	251421
Address:	N/A, Land At Old Forest Road, Wokingham.		
Proposal:	Full application for erection of 53 no. dwellings with associated landscaping, parking, drainage, open space and other associated works.		
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

This application is supported by an Ecological Impact Assessment (EcIA) (AA Environmental Ltd, ref: 253026, June 2025) and a Biodiversity Net Gain Technical Note (AA Environmental, ref: 253026, June 2025) with accompanying Statutory Biodiversity Metric (Iteration 1, 4 June 2025).

Biodiversity Net Gain

I have provided line by line comments on the baseline habitats and conditions recorded in the Statutory Biodiversity Metric iteration 1 in a copy version. At this stage I recommend that the local planning authority cannot agree the baseline as given in iteration 1. Whilst a number of lines can be agreed, I have the following concerns:

1. I cannot find any reference in the technical note to limitations of the survey or whether the site has been degraded. Please can the applicant supply explicit consideration of this matter. At this stage, I am concerned that the available historic aerial imagery and street view photos show that the site has recently been a more complex long grass mosaic criss-crossed by shorter grass as part of a worn path network. Considering the condition scoring given in the technical note, I think it likely that the baseline condition of the grass fields would up until recently have been classified as good.
2. I cannot find any reference in the EcIA, the biodiversity net gain technical note, or the submitted Tree Condition Survey, Arboricultural Implications Assessment and Tree Protection Recommendations (Goodger Design

Associates, June 2025) of any assessment as to whether there is irreplaceable habitat on site. Given that the Ancient Tree Inventory records two trees on site as being at least notable, I recommend that there should be explicit consideration of whether any trees on site meet the biodiversity net gain regulations definition of veteran tree irreplaceable habitat. The regulations are clear that all irreplaceable habitat on site needs to be recorded within the biodiversity baseline, to be agreed at the point of determination.

3. I am concerned that scrub habitat on site has not been recorded in the baseline. This includes a patch of what looks like Gorse scrub in the north-west of the site and scrub habitat where the hedgerow on the southern boundary of the site has grown out into the adjacent field.
4. I am concerned that the hedgerow recorded on site has not been recorded as 'native hedgerow with trees – associated with bank or ditch' when the tree survey identifies trees within the hedgerow. The baseline is therefore under recording the habitat type distinctiveness and score.
5. It is not clear from the descriptions of the habitats on-site whether the eastern most ditch (crossing north-south through the middle of the site) has been checked to see if it is already culverted.

If the above concerns can be addressed through further information and/or a submission of a revised iteration of the biodiversity metric, I would be able to recommend that the local planning authority can agree the Statutory Metric Biodiversity baseline.

I note that a post-development scenario has been included in the submitted metric iteration. This should not be approved at this stage (being the subject of a statutory condition if permission is granted). However, it is relevant to consider the strategy for delivery of the mandatory net gain percentage to understand whether it is relevant to secure elements of the post-development scenario via condition or planning obligation.

The applicant proposes to create and enhance to medium distinctiveness habitats in moderate condition in the post-development scenario. I am of the view that these are a significant contribution to achieving the biodiversity net gain target. I therefore recommend that they are secured via a Habitat Management and Monitoring Plan (HMMP) condition and a planning obligation to commit the owner of the public green space to maintain the habitats to the relevant condition and monitor this delivery for a minimum of thirty years.

I note that a Landscape Management Plan (Aspect Landscape Planning, ref: 8813.LMP.00i, May 2025) has been submitted as part of the application package. This is not suitable to use in place of the above recommended HMMP. It does not identify the biodiversity net gain requirements for the habitats being created or enhanced. It does not cover any monitoring of the habitats to confirm they are meeting the biodiversity net gain objectives. Neither does it cover any of the open space objectives and constraints that will need to be synthesised within the management plan and may impact on actions taken. I therefore propose an HMMP condition to allow for this detail to be resolved post determination.

Planting Plans

The submitted Planting Plans (Drawing No. 8814.PP.1.0 to 8814.PP.1.4) do not show any locations receiving a wildflower mix seed treatment (although a basic mix is specified and shown in the key). I am also concerned that they specify native shrub species that are not suited to the soil type or surrounding landscape. *Cornus sanguinea*, *Ligustrum vulgare*, *Viburnum lanata*, and *Viburnum opulus* being more suited to calcareous soils rather than the slightly acidic to neutral soils locally. This will increase the risk of native shrub failure unless the conditions are heavily modified.

Whilst I do not object to their use within this tight development parcel, it may be that the developer will want to review the species mixes if they intend to achieve the indicated habitat types in the biodiversity net gain metric post-development scenario.

Reptiles

The submitted EclA indicates that a reptile presence/likely absence survey was not conducted for the site. The adjacent Millenium Arboretum open space has had Slow-worm recorded on-site. The EclA notes that suitable habitat for reptile species does exist on-site around the boundaries. In the absence of the survey evidence indicating that reptile species are likely absent from the site, I recommend that a precautionary approach is taken and it is assumed that presence is likely due to the adjacent population and connectivity.

The EclA recommends that a range of mitigation and enhancement measures are undertaken as part of the development. It does not go any further to detail what these are or when and where they will occur. A Construction Environmental Management Plan (Stuart Michael Associates, ref: 7365/CEMP Issue 1, May 2025) has been submitted and this makes very brief mention of a mitigation measure during construction.

I am not convinced that the detail of mitigation and enhancement measures currently supplied is sufficient for protected reptile species. As the widespread reptile species are species of principal importance it is also relevant for the local planning authority to consider whether their favourable conservation status is being maintained.

The EclA provides an assessment of impact on reptiles identifying a minor adverse impact from construction and minor adverse impact of the operational phase of development. In the absence of sufficient mitigation and compensation to overcome the adverse impact, this proposal would be contrary to local plan policy CP7.

I am of the view that it is possible that a package of mitigation and compensation measures could overcome the adverse impact and could be resolved by condition. This would need to include detailed mitigation during construction, provision of ecological permeability through the development, and a package of species specific compensation/enhancement measures within the retained open space. This could be resolved by condition. On this basis I recommend a Construction Environmental Management Plan (CEMP) condition and a condition to resolve detail and delivery of species compensation and enhancement measures within the open space.

Great Crested Newt

I note that EclA paragraph 4.32 considers the Toutley Road to be a significant barrier to dispersal of Great Crested Newts, which have been recorded to the north of this road. The design of the road does include permanent amphibian fencing to limit road casualties but also provides amphibian tunnels to maintain connectivity between both parts of Millenium Arboretum.

Further, the great crested newt development licence for the road scheme included provision of a new pond within the southern parcel of Millenium Arboretum, on the same side as this development site being considered. Subsequent monitoring has identified use of this pond by the species.

It is likely that Great Crested Newt are present on the site immediately adjacent to this development proposal. There remains good habitat connectivity between the known population of this protected species and this development site. I recommend that the local planning authority seek a review of the ecological impact of this species by the applicant's ecologist in light of this information which is contrary to the assumptions that they previously used.

Bats

The presence or otherwise of protected species is a material consideration relevant to determination as it may have an impact on design.

The EclA does not include an assessment of the use of the site by foraging and commuting bats. This is contrary to survey guidance for bats. Please can the applicant provide an ecological justification for not surveying to assess the significance of the site for foraging and commuting of a European Protected Species that has the potential to be present on site.

The EclA identifies a number of trees on site with bat roost potential. Of these, three trees with PRF-I potential (T12, T13, and T14) are proposed for removal to facilitate the access road. Paragraph 5.27 recommends that further survey works is required to assess these trees. No justification is given in the EclA as to why further survey work has not been undertaken prior to determination. The EclA appears to be silent about what the implication of the further survey work discovering a bat roost in these trees is. Without the further survey work to consider presence or absence I recommend that the local planning authority has to consider the worst case scenario that the potential roost features are being used by bats. The loss of bat roosts without compensation would be contrary to local plan policy CP7. Please can the applicant's ecologist provide an updated EclA with compensation proposals for this worst case scenario to provide the confidence that favourable conservation status of bat species will be maintained and a Natural England derogation licence is not unlikely to be granted.

Paragraph 5.34 of the EclA advises that a sensitive lighting scheme will be produced to ensure that the adjacent arboretum and boundary vegetation remain unlit. An Illustrative Street Lighting Layout plan (Stuart Michael Associates, drawing no. 7365.003 rev B) has been submitted but this falls short of providing the full detail to be confident that a sensitive lighting scheme has been designed. I recommend that this cannot be recognised as an approved document by the local planning authority

if it is only submitted to be illustrative at this stage and is incomplete in information (such as lantern type, column heights, and whether baffles are to be used). I therefore recommend that a lighting for light sensitive species condition (as per the British Standard 42020:2013) is applied to ensure that key receptors and corridors for light sensitive wildlife are retained, as appropriate under local plan policy CP7 and TB23.

Species Specific Enhancement and Ecological Permeability

The submitted Hard Landscaping Plans (Drawing No. 8814.HSP.2.0 to 8814.HSP.2.1) show boundary treatments such as the close boarded fences between gardens. No detail is provided within this plan of how ecological permeability measures, such as hedgehog highway gaps, are to be provided within this boundary treatments. This is inconsistent with the approach to ecological permeability that the applicant is promoting in paragraph 5.31 of the EclA. In order to accord with local plan policy TB23, I recommend that the local planning authority seek detail within the Hard Landscaping Plans, if these plans are to be approved at determination.

Paragraph 5.33 of the EclA advises that the development will include a range of species enhancement measures but no further detail is provided within the submission. It is appropriate for the local planning authority to seek biodiversity enhancements under both the NPPF and local plan policy TB23. The detailed design of biodiversity enhancements could be resolved by condition rather than prior to determination. I therefore recommend a condition is applied to any permission granted.

Conditions & Reasons (if required)

Construction Environmental Management Plan (CEMP)

As per British Standard 42020:2013 standard condition D.4.1 unless a CEMP condition is required for another specialist reason, in which case they will need to be synthesised to create a single condition to cover both disciplines.

Lighting for Light Sensitive Species

As per British Standard 42020:2013 standard condition D.3.5

Species Specific Enhancements

Condition: *Prior to commencement, a strategy for ecological permeability and biodiversity enhancements to the site, targeting locally relevant bat, bird, invertebrate, amphibian and reptile species, shall be submitted to the local authority for its approval. Once approved the strategy shall be implemented in full unless otherwise agreed by the local authority in writing.*

Reason: *to ensure that the proposal is in accordance local plan policies CP7 and TB23 and the National Planning Policy Framework which requires consideration of the potential biodiversity gains that can be secured within developments.*

Habitat Management and Monitoring Plan (HMMP)

As per British Standard 42020:2013 standard condition D.4.5 but adapted to reference the BNG objective and revised title of HMMP rather than LEMP.

Date:	3 September 2025	Signed:	D. Fisher
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