

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	260394
Address:	Billingbear Park Golf Course, The Straight Mile, Wokingham, RG40 5SJ.		
Proposal:	Full application for phased leisure development comprising the erection of padel tennis courts and pickleball courts, formation of an outdoor putting course, erection of a simulator building, and erection of an extension to the existing clubhouse following demolition of the existing marquee, with associated alterations to car parking, access/paths, external lighting, and hard and soft landscaping.		
Type of Development:	Major All other developments		
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:

- Site Location Plan, February 2025 by Lewandoski Architects
- Proposed Site Plan, February 2025 by Lewandoski Architects
- Preliminary Ecological Appraisal, 8th December 2025, Version: Final by LHB Ecology
- Arboricultural Implications Assessment, 9th December 2025 by Merewood Arboricultural Consultancy Services
- Bat Emergence Survey, 21st October 2025, Version Final by LHB Ecology
- Biodiversity Net Gain Assessment, 9th December 2025, Version Final by LHB Ecology
- Statutory Biodiversity Metric Tool, 9th December 2025, Version 1 by Joe Slade on behalf of LHB Ecology.

Biodiversity Net Gain

To demonstrate compliance with the statutory requirement to deliver a minimum 10% biodiversity net gain, as mandated by the Environment Act 2021. The applicant has submitted a Biodiversity Net Gain Assessment supported by the statutory

biodiversity metric. The baseline habitat categorisation is supported by appropriate evidence, including photographic records and condition assessments, and is considered acceptable. Having said that, the metric baseline does show an error that requires amending discornering the baseline; in habitat parcel reference 2 of the baseline tab, the amount of area retained is higher than the amount of area recorded in area size (ha). The amount of retention cannot be more than the size of the parcel of land, therefore will require amending. Additionally, D2 baseline condition has not been completed.

The Site Location Plan by Lewandowski Architects (February 2025) identifies the application (red line) boundary and a wider blue line boundary covering the remainder of the golf course within the applicant's ownership.

Although the land within the blue line boundary is in the control of the applicant and forms part of the wider golf course, it is not currently registered as a biodiversity gain site. The proposal relies significantly on habitat creation outside the red line boundary, specifically the planting of 52 trees within this blue line area, to deliver the majority of the claimed biodiversity uplift.

In accordance with the statutory framework for Biodiversity Net Gain, off-site biodiversity gains must be both legally secured for a minimum of 30 years and formally recorded on the national Biodiversity Gain Site Register in order to be eligible to contribute towards the statutory net gain requirement. As the blue line land is not currently registered, and the metric does not show a BNG registration number the proposed tree planting cannot be counted towards the biodiversity net gain calculation.

While biodiversity net gain is typically secured via a pre-commencement condition, it remains necessary at the determination stage to demonstrate that the development is capable of achieving the statutory requirement. Excluding the unregistered off-site provision, the scheme results in an estimated 24% net loss of habitat units. As such, the application fails to demonstrate compliance with the statutory biodiversity gain objective and is contrary to Policy CP7 of the Wokingham Borough Core Strategy and the relevant provisions of the National Planning Policy Framework.

In order to address these issues, the applicant ecologist will need to revise the metric to address the error in baseline tab A-1 and the lacking information in Tab D-1. Additionally, the applicant should either amend the red line boundary to include the land proposed for habitat creation, or alternatively secure and register the land as a biodiversity gain site in accordance with the statutory requirements so that it can lawfully contribute towards the biodiversity net gain calculation.

Protected Species

Roosting, Foraging and Commuting Bats

The submitted Preliminary Ecological Appraisal (PEA) confirms that all buildings and trees proposed for removal were subject to a Preliminary Roost Assessment. Building B1 was identified as having *moderate suitability* for roosting bats. The applicant's ecologist has provided appropriate justification for this classification,

noting the nature of the roosting features, suboptimal temperature regulation, and the presence of artificial lighting. This categorisation is accepted.

In accordance with best practice guidance, Building B1 was subsequently subject to two emergence surveys (20 August and 9 September 2025). These surveys confirmed the absence of roosting bats within the structure. However, the site was found to support foraging and commuting activity by several species, including noctule, Daubenton's bat, soprano pipistrelle and brown long-eared bat.

While the PEA and bat survey report do not include activity surveys, the site is characterised by short, intensively managed grassland of low ecological value, with the loss of only five small trees proposed. Given the limited habitat value and retention of boundary vegetation and adjacent woodland, it is considered that the proposed development would not result in significant harm to bat foraging or commuting routes. On this basis, the absence of further activity surveys is acceptable.

Nevertheless, given the recorded bat activity, a sensitive lighting strategy is required to avoid impacts on commuting and foraging behaviour. All bat species and their roosts are protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. In addition, bats are listed as species of principal importance under the Natural Environment and Rural Communities Act 2006. These protections make it an offence to kill, injure, or disturb bats, or to damage or destroy a place of rest.

A sensitive lighting scheme should therefore be secured by condition, designed in accordance with best practice guidance from the Institute of Lighting Professionals and the Bat Conservation Trust (Guidance Note 08/23: *Bats and Artificial Lighting*).

Reptiles

The application site lies within a golf course, which can provide suitable habitat for reptiles. However, the works are located within an intensively managed area of short grassland in close proximity to the clubhouse, which is subject to regular disturbance. As such, the site is considered to have *moderate suitability* for reptiles, with more optimal habitat present elsewhere within the wider golf course.

The applicant's ecologist has proposed a precautionary two-stage vegetation clearance during the active reptile season (May–October, when ground temperatures exceed 10°C). This approach is supported. However, given the proximity of higher quality habitat, there remains a residual risk of reptiles being present. Therefore, it is recommended that, should works take place outside the active season, an Ecological Clerk of Works (ECoW) is present to supervise site clearance.

Both the phased clearance methodology and ECoW supervision should be secured through a Construction Environmental Management Plan (CEMP) condition.

Other Species

The site offers moderate suitability for nesting birds, and opportunities for foraging and commuting by badgers and hedgehogs. The mitigation measures outlined within the PEA are considered appropriate and proportionate to the scale and nature of the

development. These measures should also be secured through the CEMP condition to ensure their implementation.

Protected Habitats

A small block of woodland is located adjacent to, but outside, the application (red line) boundary. This area is classified as lowland mixed deciduous woodland and is identified as Ancient Woodland. As such, it is both a Habitat of Principal Importance under the Natural Environment and Rural Communities (NERC) Act 2006 and an irreplaceable habitat within the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024.

From an ecological perspective, the retention of this habitat and the provision of a 15-metre buffer zone from the proposed development accords with national guidance and is considered sufficient to maintain the woodland's ecological function. However, this is dependent on the woodland being adequately protected during the construction phase, including from potential indirect impacts such as dust, noise, and vibration. Without appropriate safeguards, there is a risk of harm to the habitat.

The applicant's ecologist recommends the installation of protective fencing with dust screening along the woodland boundary and the careful management of construction activities in proximity to the buffer. This approach is supported and should be secured as a part of the CEMP condition.

This memo relates solely to ecological matters, including habitat protection and biodiversity considerations. Matters relating to arboriculture, including tree health, structural impacts, and root protection areas, fall outside the scope of this assessment and should be addressed separately by Trees and Landscape.

In accordance with Policy TB23 (Biodiversity and Development) of the Wokingham Borough Development Plan, criterion (b) requires development proposals to maintain appropriate buffer zones between built development and Habitats of Principal Importance. The scheme includes additional tree planting along the site boundary between the development and the woodland, reinforcing the buffer and providing further ecological protection. On this basis, the proposal is considered to comply with Policy TB23.

Biodiversity Enhancements

The applicant's ecologist proposes the installation of a bat box on a retained tree and the incorporation of a swift nest box within the proposed dwelling. These enhancements allow the development to comply with chapter 15 of the NPPF and Policy TB23 of the Wokingham Borough Development Plan. It should be noted that biodiversity enhancement measures are expected to be delivered within the application (red line) boundary, unless otherwise secured through an appropriate legal mechanism. As such, the provision of a bat box on a "retained" tree may not be feasible if no such vegetation falls within the red line boundary.

Notwithstanding this, the proposed level of enhancement, comprising one bat box and one swift nest box, is considered proportionate to the scale of the development. These measures are supported in principle; however, the location of the bat box should be clarified to ensure it can be delivered within the application site. Both

enhancements should be secured by condition, through a Species Compensation and Enhancement scheme.

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 legislation Wildlife and Countryside Act 1981, Conservation of Habitats and Species Regulations 2017 and Wokingham Core Strategy, Policy CP7.

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 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:	24/04/26	Signed:	L.Aparo
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