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# MEMORANDUM

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| <b>From:</b>                | Louise Aparo<br>Ecology Officer                                                  |                |        |
| <b>Service</b>              | WBC Ecology                                                                      | <b>App No:</b> | 253122 |
| <b>Address:</b>             | Land at Cooks Hill Cottage, Bath Road, Knowl Hill.                               |                |        |
| <b>Proposal:</b>            | Permission in Principle applicaiton for the erection of up to 5 dwelling houses. |                |        |
| <b>Type of Development:</b> | Minor Dwellings (1-9)                                                            |                |        |
| <b>Site Visit Made:</b>     | 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

Habitats of Principal Importance appear to be present on site, specifically lowland mixed deciduous woodland. The submitted Visual Design and Access Statement indicates that five dwellings with associated residential gardens are proposed. While the current layout suggests that some trees may be retained, their inclusion within private residential curtilage means their long-term retention cannot be adequately secured or enforced. As such, the proposed scheme could result in the effective loss of all priority habitat on site.

As set out in the NPPF (Paragraph 180) and supported by Natural England standing advice, measurable biodiversity gains and the protection of priority habitats must be secured through mechanisms that are enforceable and deliverable in the long term. Habitats located within private residential curtilage are generally not considered capable of providing this level of certainty, as their management cannot be robustly controlled or enforced through planning conditions or obligations.

In addition, internal data indicates that both the woodland and existing buildings on site have potential to support bat roosts, which are a European Protected Species. This type of application does not allow for a full assessment against planning policy or the submission of detailed ecological information. Under Policy CP7: Biodiversity of the Wokingham Core Strategy, the loss of priority habitat will only be permitted where it has been clearly demonstrated that: the need for the development outweighs the need to safeguard the site's conservation value; no suitable

alternative site exists that would result in less harm; and appropriate mitigation or compensation measures can be secured.

However, as this application type does not enable policy assessment or the submission of sufficient ecological information, it is not possible to demonstrate compliance with Policy CP7. Therefore, the location and scale of the proposed development are considered to be contrary to this policy.

| Conditions & Reasons (if required) |         |         |          |
|------------------------------------|---------|---------|----------|
| N/A                                |         |         |          |
| Date:                              | L.Aparo | Signed: | 27.05.26 |