

MEMORANDUM

From:	Tina Cuss		
Service	WBC Ecology	App No:	241828
Address:	58 Finchampstead Road, Wokingham, Wokingham, RG40 2NS.		
Proposal:	Full application for proposed erection of 4no detached dwelling houses following demolition of the existing dwelling and associated outbuildings.		
Type of Development:	Minor Dwellings (1-9)		
Site Visit Made:	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

I have read the additional Preliminary Ecological Appraisal and Roost Assessment V2 (Arbtech, 16 December 2024), updated Biodiversity Net Gain Assessment (Arbtech, 11 February 2025) and Biodiversity Metric V1 (Arbtech, 11 February 2025).

PRELIMINARY ECOLOGICAL APPRAISAL

Habitats

The Preliminary Ecological Appraisal and Roost Assessment V2 (PEA) updated by Arbtech includes further details of the degradation of the site which occurred prior to surveys by Plan Ecology and Arbtech. The PEA has acknowledged that approximately 13 trees were felled prior to the ecological surveys and states that approximately 43 scattered trees will be retained across the site. In accordance with BNG guidance the condition of the felled trees is assumed to have been good.

While the BDR data included in the report suggests data records have been provided Arbtech is incorrect that Local Wildlife Sites and other non-statutory designations can't be established without data from TVERC. For future reference the Consultancy should be aware that ecological constraints including non-statutory designations and Wokingham District Association Veteran Tree data is available on the LPA [Constraints Map](#) which should have informed both PRA and PEAs. Plan Ecology's PEA appears to include LWS data for a different development site. The GCN records the previous Ecologist assessed were therefore also irrelevant.

The degradation of the site which occurred prior to submission of the application and proposed habitat loss shown in the Baseline Habitat Plan in BNG Assessment Appendix 3 does not appear fully consistent with the scrub and tree clearance outlined in blue in the Arboricultural Impact Assessment Tree Protection Plan (MW.20.0919.TPP19 March 2024). The AIA does not include a tree survey plan. I previously objected that the AIA assessed that replacement tree planting was not necessary. And I note that the PEA and BNG Assessment don't include any detailed proposals to compensate on-site for tree and scrub removal or detail of the landscaping shown in the architect's Site Plans.



Vegetated Garden

Site photographs and aerial images don't support the assessment that the eastern part of the site is dominated by amenity lawn grassland. I request more details are provided to justify assessing the eastern area as vegetated garden and amenity grassland.

Local Notable Habitats

The Arbtech PEA and BNG Assessment have not address my queries regarding the existing and proposed ditch or confirmed when the pond was filled in which could have implications for reptiles and amphibians. I request confirmation whether the area where the pond shown on MAGICA and in the Site Plans Dwg 09C and MW.20.0919.TPP was not accessible, or whether the applicant must include this as blue-line land in the applicant's control.

According to the PS, DAS and Flood Risk Assessment & Drainage Strategy (Lammor Consulting Ref 241778/FRA_DS/OR/RS/01 Rev A, April 2024) there is a ditch passing along the southern boundary of the site, that discharges to the Emm Brook, that will be cleaned out as part of the works and landscaped to form a feature and boundary to the site. Plan Ecology described "*There is a flowing ditch to the rear of the Site unsuitable for newts*".

For the above reasons it is not currently possible to agree the baseline and the secure a Biodiversity Net Gain condition until the Ecologist and the applicant confirm the condition of the existing ditch, if it has been infilled or degraded since 2020 and assess the habitat creation or restoration which is proposed. The impact on priority habitats as well as notable and protected species of the drainage works must be assessed and mitigation during habitat clearance, construction and the occupation phase secured. The Metric should be revised to include condition, loss, and impacts to the on-site ditches.

Preliminary Bat Roost Assessment

I agree with the Preliminary Roost Assessment summary of B1 that the house has numerous gaps in the brickwork and timber soffits, as well as gaps in the clay tiles and areas of raised lead flashing and should be assessed as having 'moderate' potential to support roosting bats. Arbtech Ecologist's PRA has failed assessed the two outbuildings which are clearly shown as existing on the PRA Appendix 1a Survey/Habitat Map and the BNG Assessment. I must thus disagree with roosting habitat paragraph stating that all buildings except the house B1 will be retained. All British bat species are fully protected by the Wildlife & Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 (as amended).

In summary, the legislation combined makes it an offence to:

- Damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a bat;
- Deliberately, intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair the ability of bats to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species; and
- Deliberately kill, injure or take any bat

All the buildings on site will be demolished to facilitate the proposed development. The application cannot be determined until at least two emergence surveys are undertaken during the active bat season to confirm or rule out the presence of bats roosts as recommended by the Ecologist. Government Circular 06/05 states that: *"It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision"*. The further survey must therefore assess the impacts of the development on foraging and commuting and provide a mitigation strategy in order for the LPA to secure mitigation in accordance with local plan policies and the NPPF.

The bat activity survey visits must be completed during the optimal survey period mid-May to August and carried out at least three weeks apart. Any variation in survey methodology from with revised edition 4 of the Bat Surveys Good Practice Guidelines should be justified and mitigation should be designed in line with CIEEM Bat Mitigation Guidelines 2023. The survey should include both outbuildings and/or the ecologist must include an update roost assessment for the shed and outbuilding not inspected by Arbtech's bat surveyor.

The Ecologist does not appear to have assessed the roost potential for the Southern beech tree T24 tree which according to the AIA will be removed. T24 is described as *"two distinct stems. Each splits at <1m. Decay and dysfunction to Eastern stem at base"*. Consideration may be given to retaining the stem which is not decaying.

The vegetation and site clearance which was undertaken prior to submission has resulted in loss of habitat that could be used by foraging or commuting bats. The assessment of bat foraging and commuting habitat refers to the mature hedgerows on site which extend beyond the site adding to the continuity of vegetated linear features present in the wider landscape. I am concerned therefore that these hedgerows are not shown on either the Survey/Habitat Map (PEA Appendix 1a, 16/12/2024) or the Baseline Habitat Plan in appendix 3 of the BNG Assessment.

As identified by Arbtech's Ecologist, the proposed development will include the use of lighting which could spill on to bat roosting, foraging or commuting habitat and deter bats from using these retained areas. In line with WBC planning policy and the NPPF, enhancement measures for hedgehogs, bats and birds including integral bat tubes, boxes or access tiles and bird boxes should be included in the development proposals and detailed landscaping plans.

Other protected species

Subject to further information on the ditch and pond I am satisfied that only bat activity surveys are needed to determine the application.

BNG ASSESSMENT

Irreplaceable Habitats

I am satisfied that the Biodiversity Net Gain (BNG) Assessment confirms that the site was degraded and scrub, grassland and large mature trees including one veteran tree were removed prior to submission of the application. Compensation

replacement trees must be agreed with the LPA and on and off compensation secured by planning obligation including a biodiversity net gain condition.

Trees

According to the Executive Summary trees T20, T21, T22, T23, T24, T26, T31, T33, T34, T38 will be retained. According to the Arboricultural Impact Assessment (Mark Welby Ref MW20.0919AIA, March 2024) A1 category T35 can be retained, however the Southern beech T24 is proposed in the AIA removed. I would not recommend approving the AIA or agreeing the BNG baseline until the inconsistencies are resolved and reports amended to make sure development proposals, Arbtech reports and the Arboricultural Method Statement and CEMP that must be secured are consistent.

Post Development Habitats

I consider that the deficit of biodiversity habitat units is likely to be higher than calculated in the metric and BNG Assessment. I have concerns that it is unlikely that neutral grassland can be created and maintained in the long-term by contractors retained to implement landscape management and habitat management and monitoring outside of private garden. The estimated time to target condition has not taken account of construction access. As the Ecologist states in section 4.4, a Biodiversity Net Gain Management Plan must be produced for the site. However, the Management Plan that is secured by planning obligation must include funded proposals for implementation management and monitoring which have been agreed with the Owner and contractor prepared by competent ecologists and landscape architects according to Habitat Management and Monitoring Plan guidelines and templates. It is unlikely that obligations could be secured for long-term maintenance of private gardens and land which would be conveyed to householders.

Summary

I am happy to provide further comment when the bat emergence/retry surveys and protected species mitigation strategy have been submitted.

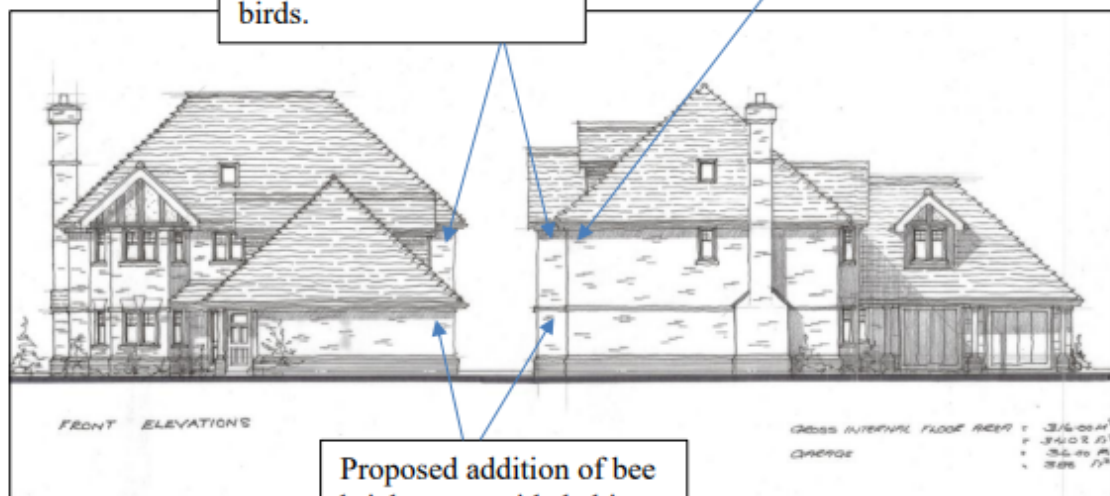
Conditions & Reasons (if required)

Date:	11/04/25	Signed:	T Cuss
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Proposed addition of bird nesting bricks to provide nesting opportunities for birds.

Proposed addition of bat bricks to provide roosting potential for bats



Proposed addition of bee bricks to provide habitat for bees onsite.

Appendix B Photographs/ Target Notes



TN 1: Timber clad shed.

TN 2: Muddy terrain



TN 3: Rear elevation of house.

TN 4: Interlocking roof tiles in good condition no lifting or gaps.



TN 15: Wooden outbuilding.

TN 16: Small wooden shed.