

MEMORANDUM

From:	Tina Cuss Ecology Officer	To (Case Officer):	Marcus Watts
Service	WBC Ecology	App No:	251233
Address:	Warren Crest Farm, Wick Hill Lane, Finchampstead, Wokingham, RG40 3PY.		
Type of Development:	Minor Dwellings (1-9)		
Proposal:	Full application for the proposed erection of 3no. dwellings following demolition of existing dwelling, outbuilding and agricultural barns.		
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

BASELINE HABITATS

In order to agree the baseline, more information and a clearer Baseline Habitats map is needed to assess whether habitat estimated as lost in Table 5.1, and if the metric is accurate. According to the Site Plan, it appears that less than 0.143ha of modified grassland in PR1, PR3 and PR4 would be retained. I consider it likely more of PR1, PR3, and PR4 would be maintained as private garden or is proposed to be seeded with wildflower grassland, therefore not retained. I request the Baseline Habitats Plan is revised and further annotation/explanation is given to clarify where the boundaries of each parcel are. This should include details of the parcels immediately to the south of the farmhouse, and to the east of B3. Can the Ecologist please clarify on the map, and metric user comments, if the retained 0.143ha of poor grassland includes P4?

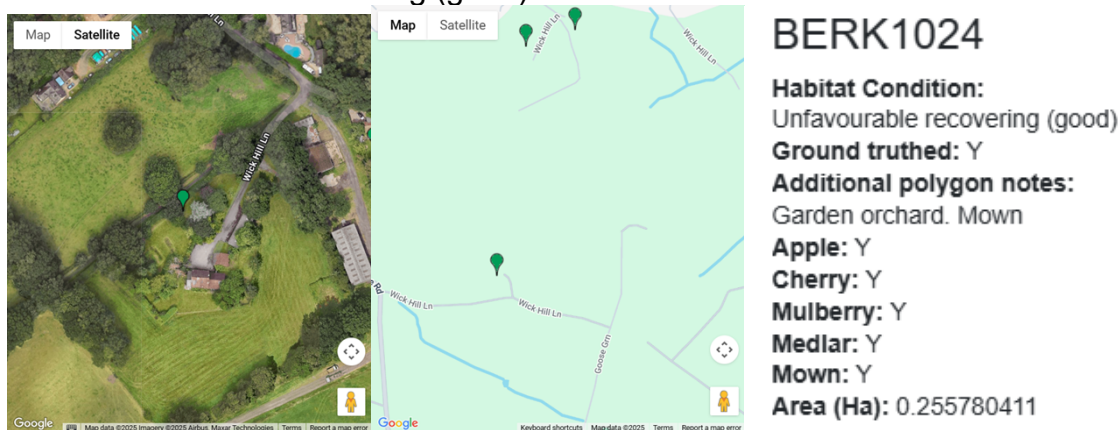
Grassland

I disagree that the species described in Table 4.2 match the UKHAB Modified grassland definition or that there is evidence of high soil fertility throughout PR1-3. The grassland descriptions, particularly PR2 and PR3 do fit within the UKHAB Other neutral grassland definitions. Evidence must be provided as to which parcels and areas of the site were vegetated garden in 2020, and/or I request the relevant parts of the grasslands parcels are reassessed as other neutral grassland.

Orchard Habitat (PR5)

I don't recommend agreeing the baseline, as I don't agree that the Ecologist has provided evidence that the habitat in P5 is Intensive orchard.

According to DEFRA Traditional Orchards Habitat Action Plan Inventory 2024 the *"Inventory provides a baseline to enable future changes to be measured; and identify priorities for future conservation actions. This dataset has been derived using aerial photography, Ordnance Survey MasterMap, external datasets compiled from historic surveys, and ground survey ('ground-truthing')"*. According to PTES Orchard Maps record BERKS 1024 has been ground-truthed, and the species list appears consistent with the AIA. It is therefore incorrect to say no site visit by qualified professionals was carried out. PTES have assessed the Traditional Orchard habitat as in unfavourable recovering (good) condition.



The EclA describes the orchard consisting of *"14 fruit trees spaced so the canopies are 2-5m from each other, with strong evidence of intensive historical pruning"*. While according to the 2024 Inventory definition traditional orchards are defined as *"sites where at least five fruit trees must be present with **no more than 20m** between their crown edges. Traditional orchards are managed in a low intensity way with the orchard floor grazed or mown for hay and with little or no chemical input"*. Evidence of formative and or restorative pruning to maintain longevity of trees is a metric Condition Assessment Criteria.

While the grassland is assessed at modified grassland, no evidence of treatment with herbicide and management with intensive mowing has been provide. According to the Ecologist there are no young trees, contradicting the UKHab Intensive Orchard definition. The Ecologist has not included any analysis or detailed assessment of soils in either orchard.

Photograph 11: PR5 with T30/T31 (right) (2025) Photograph 12: T27 (2025)



Photograph 11: PR5



Photograph 8: PR2 with trees T11-T14 (2025)



The revised EclA confirms that the trees are 2-5m in height. The report doesn't reference the guidance used to define 2-5m trees as dwarf root stock. The Traditional Orchards HAP Inventory does not define the size of root stock or minimum distance between crowns or boles. The The UK BAP Traditional Orchards Priority Habitat, describes "*dwarf or bush fruit trees at **75cm or less***". I must therefore question that the trees in the P5 orchard are dwarf trees.

The Ecologist concluded the orchard planted in the 1970's. While the Tree Survey and EclA do not record any newly planted or young trees, the condition assessment sheet describes "Young trees over 7.5 in diameter". UK BAP Priority Habitat Descriptions states "*Prime traditional orchard habitat consists of grazed grassland with fruit trees of varying age structure, with an abundance of standing and fallen dead and decaying wood. Young trees and newly planted orchards that are managed in a low intensity way are also included in the definition*". The age structure of the nut and fruit trees therefore don't rule out Traditional orchard. The number of flowering cherries and ornamental recorded by the Ecologist is not consistent with the AIA tree schedule.

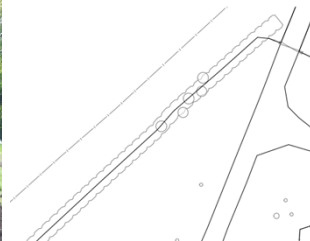
For the above reasons I don't agree that the PR5 orchard fits the UKHab or Inventory Intensive Orchard description. I am not satisfied that the habitat units in PR5 reflect the habitat condition. I am concerned the condition includes errors and suggest that the biodiversity habitat units should be assessed higher. I suggest P5 is classified as Traditional orchard and the condition assessment is revised to take account of deadwood, percentage of scrub, formative pruning, lack of browse damage and grazing and invasive species as well as the lack of species diversity in the grasslands.

Rural Trees, Hedgerows and Lines of Trees

According to UKHab and the metric User Guidance, the habitat underneath the tree canopy (of woodlands or individual trees) must be recorded. Area equivalent of individual trees is not related to the site area, and the metric doesn't count the area of individual trees towards the site area. It is therefore not material whether the redline and site boundary includes all the boles of T1–T5. The application and the EclA have failed to include the existing site plan. The Location Plan also shows the northwestern redline site edge as a straight line which runs parallel to the walked line of Footpath, stock netting fenceline and new Holly hedgerow. The line of H1 shown in the May 2025 revision of the Baseline Habitats drawing is not consistent with

aerial photo or any other drawings and maps submitted and no photo of east side of the boundary have been provided confirming the trees and hedge are not as proposed in the Landscape Plan.

To ensure the baseline linear habitat units can be agreed by the LPA I request submission of the existing site which has been provided to the Arboriculturist. The line of H1 shown in the May 2025 revision of the Baseline Habitats drawing is not consistent with aerial photo or any other drawings and maps submitted and no photo of east side of the boundary have been provided confirming the trees and hedge are not as proposed in the Landscape Plan.



I request that the metric is revised to include all sections of the hedgerow H1 that are in the redline (shown as a straight western boundary line), and that the good and moderate habitat condition trees T1-T5 which over sail or are located on the site boundary are recorded. I am happy to review photos and cross sections or topographical drawings and evidence which should have been included in the metric.

The metric and EclA should consider the Wokingham Biodiversity Action Plan Grassland and Hedgerow HAP policy and objectives. WBAP paragraph 3.4.2 states *“All major structural components of the hedge are important. Many species use more than one structural component. The high value of hedgerow trees is of particular note given that numbers of such trees are currently falling rapidly”*. The strategic significance of the hedgerow trees and individual boundary trees, in particular the mature Oaks, and potentially the orchard could be assessed as ‘Location ecologically desirable but not in local strategy’.

Cropland/Herb Garden

I consider that the area amended from Horticulture to Vegetated garden could be recorded at Allotment. UKHAB defines Allotment as “land used for the cultivation of fruit and vegetables”. While the land is not *“rented to local people”*, EclA table 4.2 describes a vegetable garden dominated by Marjoram with Lavender, Rosemary, Fennel and Gooseberry. The biodiversity assessment and metric must record habitat, condition and management at the relevant date of January 2020 and take account of the loss of the biodiversity value of the herb and fruit bushes. I suggest calculating the biodiversity units as if this habitat was Allotment rather than Urban vegetated garden. In addition to the net loss of biodiversity habitat, the ecological appraisal must into account the direct and indirect effects of loss of invertebrates and fruit on foraging mammals, birds.

Vacant or Derelict / Sparsely vegetated urban Land

UKHab defines Vacant or derelict land as *“Areas that have been disturbed by previous development or land use on constructed sites but are now abandoned. They will contain an open mosaic of habitats in the early stages of natural succession”*. I disagree that, as the site is not assessed degraded since the relevant

date, the southeast corner should be classed as Vacant or derelict land. The percentage of bare earth and ivy ground cover don't meet the Vacant or derelict land definition. I request that the parcel shown as Sparsely vegetated on Baseline Habitats drawing 4442-DR0001-RevA is amended to Introduced Shrub.



Biodiversity Metric

I have provided a version of the metric V2.1 with requested amendments to take account of the condition and management of the orchard habitat, the western boundary hedge, and the lack of evidence of retention of grassland PR1 and PR3. I have made a number of LPA comments which I request are taken into account in order that the LPA can agree baseline biodiversity and linear habitat values.

Mitigation Hierarchy

I disagree with section 5.1.2 that the applicant as adopted the 'Mitigation Hierarchy'. Removal of fruit trees and orchard habitat have not been adequately avoided or reduced. Alternative layouts, and in particular reduction size of the swimming pool, gym and carport and need for 3 plant rooms, are not considered.

Local Plan policy CP3 states planning permission will be granted for proposals that c) Have no detrimental impact upon important ecological, heritage, landscape features.

d) Maintain or enhance the ability of the site to support fauna and flora including protected species. And

f) Contribute to a sense of place in the buildings and spaces themselves and in the way they integrate with their surroundings including the use of appropriate landscaping.

CP7 requires that development mitigation measures can be put in place to prevent damaging impacts to reduce harm to habitats or, species of principle importance, veteran trees or features of importance for wildlife, or appropriate compensation measures. According to TB23 development proposals will only be granted where they comply with CP7 and also demonstrate how they:

b) Provide appropriate buffer zones between development proposals and habitats and species of principle importance.

c) Ensure that all existing and new developments are ecologically permeable through the protection of existing and the provision of new or links to existing continuous wildlife corridors.

Policy TB23 requires the incorporation of new biodiversity features, buffers between habitats and species of importance and integration with the wider green infrastructure network.

Proposals for mitigation and compensation which can be secured as planning obligations by condition or legal agreement, should be detailed in EclA and be consistent with the Proposed Site Plan and Landscape Plan if the application is approved. I have a number of concerns regarding the detail of the recommendations made in EclA section 5:

R2: Native Planting, LVIA & Landscape Plan

The mitigation measures recommended Ecologist have not been appropriately included in the revised Landscape Plan or revised Site Plan. No post-development habitat map has been included in the metric or EclA. To approve the application the Landscape Plan and Site Plan should be consistent with mitigation proposals that the Ecologist has agreed with the applicant to ensure that they are deliverable and can be maintained long term. In accordance with the above planning policy and the NPPF 187, the on-site planting proposals and mitigation must be planning condition including a Construction Environmental Management Plan (CEMP Biodiversity) outlined in R7 paragraph 5.5.4 – 5.5.6.

The proposed tree and shrub planting (LVIA Section 7.2) is limited to part of the northwestern boundary and would cause loss of grassland PR2 and may impact or constrain the opportunity to restore Traditional Orchard and establish species rich grassland. The Ecologist's letter also recommends native planting along the northwestern edge. They have however, not assessed the impact and the detail of the landscape screening proposals in PR2, and the habitat loss that would result from the LVIA recommendation for rationalizing the "*electic mix of non-native species*".

It is unclear why the "*possibility to enhance with significant trees to be retained*" of the remnant orchard has been removed from LVIA Revision E, when the restoration orchard in PR5 is recommended in the EclA. The landscape proposals for unspecified trees and shrubs to be planted to screen of the replacement buildings

appear contradict the EclA Section 5 proposal for planting fruit and nut trees to restore or enhance the orchard on PR2. Landscape Plan PWL-ZZ-XX-DR-L-1001 RevP07 doesn't demonstrate that the northwestern shrub and screen planting meet the objectives of compensating loss of landscape trees and fruit and nut tree species which would be removed to facilitate development. No buffer strip has been proposed to protect the lines of mature Oaks. The details of how the applicant proposes strengthening the existing vegetated boundaries with under-storey and hedgerow planting should be included in the application and assessed by the Ecologist and the LPA.

While AIA advises compensating for the loss of the large Mulberry T32, neither of the other assessment reports includes this in the compensation proposals. The Ecological Appraisal has not assessed the impact on wildlife of the potential to remove the Leylandii hedge recommended in Figure 14 *"to bring more light into the space to the north and provide a more open character to the garden"*.

I cannot recommend agreeing the Landscape Plan, AIA EclA or the Site Plan unless the proposals are consistent, including regarding removal of fencing, construction of a ha-ha on the southern boundary and the detail of the eastern boundary fence. In order to support approval of the Proposed Site Plan 23046-PP201 3-F must be updated to take account of retention of trees T30, T36 and T39, includes any shrub planting in the northwest that is supported by ecological mitigation objectives, and must be consistent with the Landscape Plans. The Proposed Site Plan must be updated to show hard landscaping details and the number of native landscape and fruit new trees, native scrub and informal shrub planting that is proposed.

The indicative Landscaping Plan with no species schedule don't demonstrate adequately that ornamental garden areas (including lawns) will be restricted to small areas directly adjacent to the dwelling. When taking into account post-development biodiversity value the LPA will need to be satisfied habitat creation will be maintained for 30 years. The fencing around the herb garden and orchards is proposed to be removed, and according to the LVIA and Landscape Plan a wider area will be maintained as private garden. I am not satisfied that the Ecologist and Landscape Consultant's reports demonstrate how informal landscaping incorporating the existing retained trees and created wildflower grassland will be maintained and recreation impacts limited and formal landscaping restricted.

For the above reasons I disagree with the conclusions of the LVIA proposals and conclusion that on-site planting currently proposed will provide a net enhancement or positive contribution to biodiversity. In the absence of species schedules and a post-development biodiversity habitat plan, I am not satisfied that high-quality planting has been proposed across the site as stated in the D&A Section 3. While I welcome proposals for mixed native broadleaved hedgerow planting on the boundaries of the cottage and the flat, it is not clear that seeding with Emorsgate Flowering Lawn Mixture EL1 will ensure species diverse neutral grassland will be retained. Elder must please be removed from the proposed hedge planting species schedule.

To assess the net loss and gain of biodiversity habitats arising from the development proposals any biodiversity habitats proposed to be maintained be managed and monitored for 30 years from completion of landscaping. The EclA includes no

proposals or recommendation for long-term landscape and ecological management of the grassland to be retained, or on-site habitat creation proposed in the assessment reports. In line with local plan policy and proposals for retention of biodiversity habitat the obligation for minimum 30-year Habitat Management and Monitoring Plan and Landscape Ecological Management Plan must be secured and details of hard and soft landscaping and habitat creation approved by the LPA.

I support the sensitive removal and management of non-native invasive Cherry laurel in western boundary hedge H1. However, the landscape screening impacts of removal have not been assessed in the LVIA and the BNG metric includes no proposals for on-site habitat creation. I am happy for measures to control Cherry laurel may be included a LEMP and the HMMP that would be secured, but on-site hedge restoration cannot be included in the off-site compensation units provide on the registered site secured by the Biodiversity Gain Plan condition.

In the absence of on-site habitat compensation, detailed landscaping and sections and a scheme to avoid increase in artificial light pollution and minimize disturbance the site plan, D&A and LVIA landscape proposals and recommendations for protected species and habitat mitigation do not demonstrate how the scheme has responded to the requirements of CP3, CP7 and TB23

So on-site mitigation obligations can be secured, I request the LVIA, EcIA, AIA and Landscape Plan and Site Proposals plan are amended demonstrate consistent proposals for on-site compensation and habitat retention in line with the mitigation hierarchy.

Protected Species Impacts Mitigation

I understand boards were installed in the main loft of house after 2022. Ecology by Design did not undertake DNA analysis of the droppings which were observed round loft hatch and an internal inspection of the void was not able to be completed previously. The Ecologist did not assess whether the droppings in the loft were likely to have been deposited by void-dwelling Long-eared bats, or crevice-dwelling species such as Pipistrelle spp. It is not clear if access gaps may have been obstructed and when previously recorded bat droppings were removed from the loft.

As it is unclear if a Pipistrelle roost or Long-eared bat roost was lost, I suggest the opportunity to provide a compensation and enhancement for void-dwelling bats should be considered. I recommend the precautionary approach that was agreed and secured in the 241564 decision, should still be employed. The removal of potential roosting features and stripping of the loft should be supervised by a Project Ecologist and undertaken by hand. If the application is approved, I request a pre-commencement survey check condition is imposed to ensure bats are not illegally disturbed and no bat roosts are lost unless a Protected Species Licence has been granted or Non-licensed Method Statement has been agreed.

R6 Bat Boxes

The mitigation measures for bats proposed should compensate for the number of potential roosting features recorded on the site. The detail of the integral bat and bird boxes and a scheme of ecological enhancements for the site must be submitted to and approved prior to commencement, and implemented as approved.

R4: Artificial Lighting

I agree that bollard lighting and low-level lighting are not necessary and will be discouraged by the Project Ecologist. The Ecologist has not justified the need lighting to waymark and delineate path edges. I am concerned that the lighting principles proposed by the Ecologist have not taken adequate account of the glare, large increase in levels of light pollution the large and unnecessary number of roof lights and the extent of the glazing and location of access doors on each elevation shown in the plans and elevation. I am not satisfied that the first artificial lighting principle the Ecologist states “*will need to be adopted*” of maintaining dark corridors along **existing** bat commuting/foraging features is achievable. Submission, approval, implementation and maintenance of an external lighting strategy must be secured by condition.

Summary

In order to agree the baseline for biodiversity habitat and linear habitat units I recommend the following plans are submitted and amendments made to the metric, EclA, Proposed Site Plan and Landscape Proposals:

- Submission of Existing Layout.
- Amendment of Baseline Habitats dwg to better identify parcels
- Provision of Post-development map to show PR1 & PR3 grassland retained.
- Intensive Orchard classified as Traditional Orchard.
- Developed land ; sealed surface classified as Introduced shrubs.
- Amendment of Proposed Site plan to be consistent with retained trees mitigation and compensation proposals.
- Revised Landscape Plan to include tree, orchard and shrub species schedules.
- CONFIDENTIAL Plan to identify Badger sett location.

An Arboricultural Method Statement, CEMP Biodiversity, lighting strategy, detailed landscaping plans, scheme of ecological enhancements, and a HMMP must be secured by condition.

Conditions & Reasons (if required)

S106 Legal Agreement

S106 securing off-site Biodiversity habitat and hedgerow units, implementation of the on and off-site Habitat Management and Monitoring Plan and Biodiversity Gain Land Monitoring Contribution. And TBH SPA SAMM contributions.

Biodiversity Gain Plan

The biodiversity gain plan must include:

- (a) adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;
- (b) the pre-development biodiversity value of the onsite habitat;
- (c) the post-development biodiversity value of the onsite habitat;
- (d) any registered off-site biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development;
- (e) any biodiversity credits purchased for the development; and
- (f) any such other matters as the Secretary of State may by regulations specify.

The Biodiversity Gain Plan shall be prepared in accordance with the Metric version

XXX dated [] Ecological Impact Assessment dated [] and prepared by Ecology by Design.

Biodiversity Enhancement Condition:

Not to commence the development until details of biodiversity enhancements and timescales and maintenance schedules to include integral bird boxes, bat tiles and/or bricks on each dwelling, and Woodcrete boxes around the site and log piles and features for invertebrates, reptiles and amphibians has been submitted and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved.

Reason: To incorporate biodiversity in and around developments and ensure that protected and priority species are not adversely Core Strategy policy CP3 and CP7 Managing Development Delivery Local Plan policy TB23.

BS42020 D3.5 Lighting design strategy submitted and approved prior to commencement.

CEMP Biodiversity Condition: CEMP to be submitted and approved prior to commencement. To include but not be exclusive to the Precautionary Working Method Statement R7 provided in the EclA.

Reason To secure protection and ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF Section 15 Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

CL5

Reason: To secure the retention and protection of trees, shrubs and hedges growing within the site which are of biodiversity value. Relevant policies Core Strategy policy CP3 and CP7 Managing Development Delivery Local Plan policy TB23.

Habitat Management and Monitoring Plan including long-term landscape management obligations.

CL6 & CL7

Reason: To secure the retention and protection of trees, shrubs and hedges growing within the site which are of biodiversity value. Relevant policies Core Strategy policy CP3 and CP7 Managing Development Delivery policy TB23.

Non-let/No Sale & Ancillary Accommodation

CT2 & CT3

Date:	18/11/25	Signed:	T Cuss
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