

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**

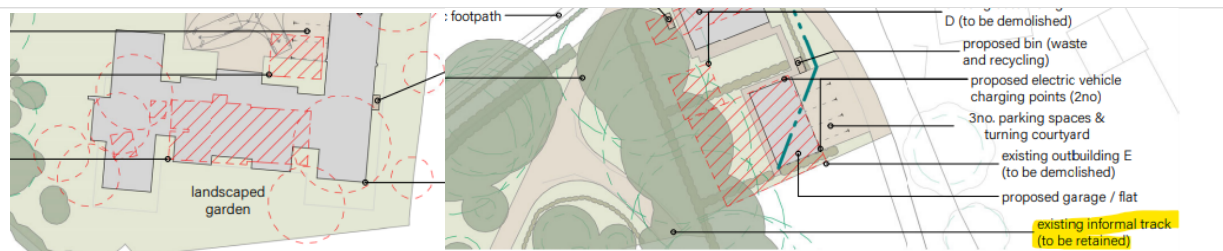
Comments On Proposal

I have reviewed the Ecological Impact Assessment V3 (EBD, December 2025), Ecology by Design letter of 15 December 2025,

Grassland

While PR1 has not been subdivided, labelling of PR3 south of the house will be helpful to ensure monitoring of retained biodiversity habitat.

According to the Proposed Site Plan 23046-PP2013-E the area of PR3 to the south of the house will be "*landscaped garden*". I note the loss of PR1 grassland to a surfaced informal track is not considered. It is unlikely that grassland on the east of the demolished barns and proposed cottages will be retained unimpacted. While this does not affect the baseline habitat units, I am not persuaded that that 0.15ha of modified grassland will be retained and areas of grassland will not be created or maintained in the long-term as private garden. Provide that the biodiversity gain plan and habitat maintenance and monitoring plan will ensure PR4 is restored and retained and lack of maintenance or loss of PR1 and PR3 are addressed I have no objection to the baseline grassland units calculated. I remain concerned that according to the Landscape Pla PWL-ZZ-XX-DR-L-1001 PO7 (September 2025) that PR2 would be lost to shrub and screen planting and ornamental tree species and the Good habitat condition will not be maintained.



Orchard Habitat (PR5)

I am satisfied photographs 29 and 32 help clarify matters, and demonstrate that the root stock is not dwarfing and trees are not densely spaced, nor are herbicided strips visible. According to UK BAP Priority Habitat Descriptions the “*simplest visual indicator of intensive management is the presence of herbicided strips along the tree rows, where the ground is generally bare or with some annual plant re-growth; contrasting with the permanent grassland of the between-row spaces. Such strips are readily observable on aerial photographs*”. Central Science Laboratory concluded that orchards with fully grassed floors can be considered traditional.

The Orchard Biodiversity Officer at PTES who provide the Secretariat for Orchard Network has confirmed that BERK1024 was ground-truthed for the 2024 inventory and is potentially traditional orchard. They state that the trees would never have been managed intensively, and that “*the older trees at least, are not dwarfing trees*”. EBD have measured the crowns of the fruit trees which they view is a completely inappropriate method of establishing planting pattern, rather than measuring between planting positions. The Orchard Biodiversity Officer advises: “There is no such thing as “*intensive pruning ... to maximise fruit production*”, that is merely typical good orchard husbandry”.

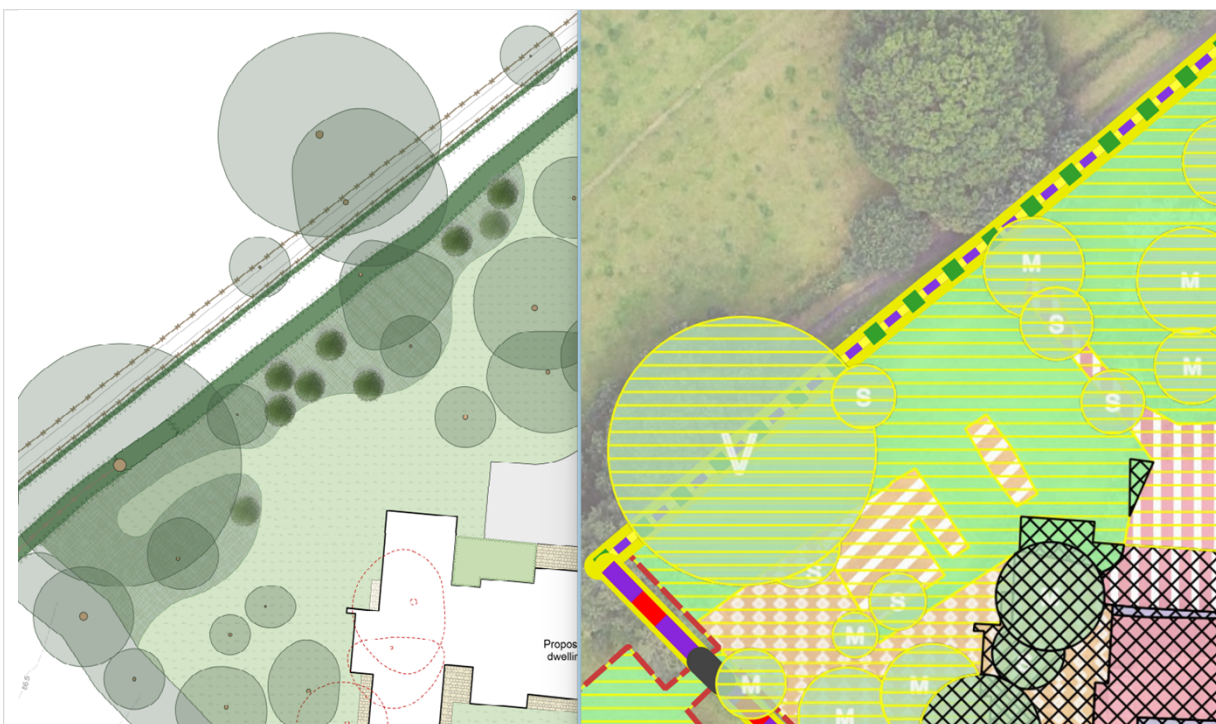
The Orchard Maps website and the Orchard Network’s Officer have confirmed the survey was ground-truthed, and the EclA V2 does not demonstrate the orchard is intensively managed. I am therefore pleased that the applicant has agreed to change the classification and compensate for the loss of priority orchard habitat as confirmed in the Ecologist’s letter.

Rural Trees, Hedgerows and Lines of Trees

I acknowledge that native H1 has been amended and extended to the redline boundary and combined into a single feature a native hedgerow with trees in Good habitat condition. I note H1 may meet the additional criteria and that is it includes at least one mature or veteran tree per 50m of hedgerow and that the hedgerow trees are in healthy condition. The Ecologist does not record any damage from livestock or wild animals, disease or human activity. I am happy to agree the On-site Hedge baseline biodiversity units recorded in metric version 3.

Cropland/Herb Garden

According to the submitted Landscape Plan the 0.012ha of allotment would be included in proposed shrub and screen planting and would therefore be lost and vegetated garden created. If the application is approved, the biodiversity gain plan and detailed landscaping plan, and where appropriate Habitat Management and Monitoring Plan that are secured must retain biodiversity habitat and compensate for biodiversity units which are lost or where habitat condition will not be maintained for 30 years.



Landscape Proposals

Landscape Plan

I am concerned that the Landscape Plan PWL-ZZ-XX-DR-L-1001 RevP07 has not been amended to omit the construction of a ha-ha to ensure the site ecologically permeable to hedgehogs, badger and herpetofauna and provide enhancements and a continuous wildlife. I request the Landscape Plan AND LVIA are not approved unless they are consistent with the EcIA V3.

R2: Native Planting

I support the proposal for planting of additional fruit trees on PR2 and for the management and removal of invasive species such as Cherry laurel from H1. I request that Elder (*Sambucus nigra*) is NOT included in any native hedge mix. I support the sensitive removal and management of non-native invasive Cherry laurel in western boundary hedge H1. The recommendations have not been agreed with the owner therefore proposals need to be included in the Habitat Management and Monitoring Plan or LEMP.

Protected Species Impacts Mitigation

R4: Artificial Lighting

I agree that bollard lighting and low-level lighting are not required and illumination of access roads is unnecessary. I welcome the inclusion of biodiversity-sensitive lighting best practice which must be used to inform changes to the lighting proposed. Roof lights and lanterns should be fitted with integral filters and blinds to limit light pollution impact on replacement bat roost features and enhancements for wildlife. Submission, approval, implementation and maintenance of an external lighting strategy must be secured by condition.

R5 & R9

The enhancement for bats and birds recommended in paragraphs 5.4.6-5.4.7 and 5.5.6–5.5.9 must be secured by planning condition.

R8 Precautionary Working Method Statement

Submission, approval and implementation of a Precautionary Working Method Statement or CEMP including supervision by a ECoW as proposed in section 5.5.3 – 5.5.5 should 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. 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 3 dated December 2025, Ecological Impact Assessment version 3 dated December 2025 prepared by Ecology by Design.

Condition: The development shall not commence until a [Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan and recommendations provided in Section 5 Ecological Impact Assessment V3 (Ecology by Design, December 2025), has been submitted to, and approved in writing by, the local planning authority and including:

- (a) a non-technical summary;
- (b) aims and objectives of management
- (c) appropriate management proposals for achieving aims and objectives;
- (d) maintenance schedules and timetabled prescriptions for management actions,
- (e) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (f) the planned habitat creation and enhancement works to maintain on-site habitat or create or improve habitat off-site to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- (g) ongoing monitoring and the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development;
- (h) the monitoring methodology and frequency to be submitted to the local planning authority;
- (i) how contingencies and/or remedial action will be identified, agreed

and implemented where the results from monitoring show that conservation aims and objectives of the HMMP are not being met.

Notice in writing shall be given to the Council when the HMMP works have started.

Reason: To secure the retention and protection of trees, shrubs and hedges growing within the site which are of biodiversity value and ensure that protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 Section 15, Core Strategy policies CP1, CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

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 but not be exclusive to the Precautionary Working Method Statement R7 provided in the Ecological Impact Assessment V3 (EBD, December 2025). It 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.

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.

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 in accordance with the recommendations provided in Section 5 of the EcIA V3 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.

Condition: Prior to commencement a site lighting design strategy for biodiversity for designed in accordance with best practice including in accordance with

[Bats and Artificial Lighting at Night' Guidance Note GN 08 / 23](#) 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[... *insert species amphibians birds invertebrates...*] 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. **Reason** To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF paragraph 198 Section 15 (Conserving and Enhancing the Natural Environment), Core Strategy policies CP1, CP3 and Managing Development Delivery Local Plan policy TB23.

Condition: Prior to the commencement of the development, full details of both hard and soft landscape proposals shall be submitted to and approved in writing by the local planning authority. These details shall include as appropriate, proposed boundary treatments with hedgehog gaps, car parking layouts, hard surfacing materials and minor structure (e.g. refuse or other storage). Soft landscaping details shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate, and implementation timetable.

All hard and soft landscape works shall be carried out in accordance with the approved details in accordance with a timetable approved in writing by the local planning authority. Any trees or plants which, within a period of thirty years after planting, are removed, die or become seriously damaged or defective, shall be replaced in the next planting season with others of species, size and number as originally approved and permanently retained.

Reason: To ensure that there is no net loss of biodiversity habitat and 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.

CL6

Reason: To ensure that there is no net loss of biodiversity habitat and protected and priority species are not adversely affected by the proposals. Relevant policies Core Strategy policy CP3 and CP7 Managing Development Delivery policy TB23.

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.

Condition CT2/CT3: No buildings, enlargement or alterations, enclosure, swimming or other pool, or container for the storage of oil or liquid petroleum permitted shall be carried out without the express permission in writing of the local planning authority. **Reason:** To protect biodiversity and safeguard the character of the Countryside. Relevant policy: NPPF 2024 Section 15, Core Strategy policies

CP1 and CP3 and Managing Development Delivery Local Plan policy TB23.

Condition CU3: The main dwellinghouse and the dwelling shall remain in use as a single dwellinghouse and shall be used as ancillary accommodation to the not be used, sold or sub-let as separate dwellings or commercial use.

Reason: Separate unit/s of accommodation of this nature may not be acceptable in this location in the interests of the wildlife and biodiversity habitats and character of the area in accordance with Core Strategy Policies CP1, CP3, CP7, and Managing Development Delivery Local Plan Policy TB23.

Date:

08/01/26

Signed:

T Cuss