

MEMORANDUM

From:	Duncan Fisher Ecology Officer		
Service	WBC Ecology	App No:	242421
Address:	School Road, Arborfield Cross.		
Proposal:	Outline application for the proposed erection of up to 95 No. dwellings, together with open space and associated works. (All matters reserved except for means of access).		
Type of Development:	Major Dwellings (10+)		
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

Habitats Regulations Assessment

The applicant has submitted a report 'Information to Inform an Habitats Regulations Assessment' (Derek Finnie Associates, ref: DFA24072V3, September 2024). I agree that this site is screened in for appropriate assessment because of the proximity of the site to the Thames Basin Heaths Special Protection Area and the consequent risk that net new dwellings will result in increased recreational pressure on this site of international importance.

The proposal is to mitigate the recreational pressure from the new development through the use of SANG and SAMM, as per an accepted delivery framework. I agree that 95 net new dwellings will require at least 1.82ha of SANG.

The development does not propose to provide a bespoke SANG solution on site. Instead, reference is made to purchasing capacity from the University of Reading at the Ridge SANG. This application would be within the catchment for the Ridge SANG. However, the latest consumption and allocation figures that the University of Reading has supplied to Wokingham Borough Council indicate that there is not 1.82ha of SANG capacity remaining at the Ridge.

It is therefore not clear that there is a viable SANG mitigation measure that would be secured. It may be that the University of Reading is willing to offer capacity at

another potential SANG site (such as Langley Mead Extension). However, the local planning authority can only be confident of the viability of strategic SANG supply if the University of Reading is willing to enter into a planning obligation to secure the alternative SANG site and allocate the relevant portion to this scheme.

If there is no planning obligation securing sufficient SANG and SAMM, this planning application does not pass appropriate assessment and planning permission must be refused.

Biodiversity Net Gain

A Biodiversity Net Gain report has been supplied in Appendix 1 of the submitted Ecological Assessment (Derek Finnie Associates, ref: DFA24071V3, September 2024) and a completed Statutory Biodiversity Metric (completed by: Derek Finnie, date of completion 16 September 2024), which I shall consider to be calculation iteration 1, have been submitted.

I have supplied direct line-by-line comments to the baseline assessment tabs within the Statutory Biodiversity Metric (see: BNG Metric – Iteration 1 – LPA Comments). It is not yet at a stage where I can recommend that the baseline can be agreed. Without agreement of the baseline and the date of the survey, there is a risk that the proposal cannot accurately deliver the required 10% biodiversity net gain.

I recommend that further information is supplied in order to reach a point where there is agreement as to the baseline habitat types and condition prior to approval. In particular, the applicant will need to review the linear feature habitat types and ensure that the relevant individual trees that are proposed to be removed are included within the baseline, as per the user guide.

In terms of general biodiversity net gain strategy, I note that the assessment so far indicates that the development will seek to secure the mandatory net gain requirement through habitat creation and enhancement on site. This is appropriate under the mitigation hierarchy. If permission is granted, then the final design of the landscaping in public areas will need to be secured by condition and ongoing management proposals approved via a Habitat Management and Monitoring Plan (HMMP) condition. Monitoring of delivery of the HMMP will need to be secured via a planning obligation or conservation covenant.

Protected Species – Bats

Paragraph 3.6.3 of the Ecological Assessment indicates that the bat surveys were ongoing at the time the report was written. Paragraph 4.3.8 of the same advises that a fuller analysis of the bat survey results will be provided. So far, no further bat survey information has been submitted. At this stage, the local planning authority cannot be confident that sufficient bat survey information has been submitted for it to be able to assess the impact of the proposals on bats.

Because there is further survey information outstanding, it is perhaps a bit premature to comment on the figures reported in 4.3.6 and 4.3.7 and the ecological assessment made in paragraph 5.2.8. However, it is worth saying that it would be helpful if the further information report on bats contains:

- a) Weather information for the nights of the static detector deployment dates and discussion as to whether this introduces any limitations to the results.
- b) An analysis of the static detector records using the free to use Ecobats tool that is now back up and running on the Mammal Society webpages.
- c) Some discussion within the assessment of the difference in species composition recorded for the site and the species returned from the local data search.

I recommend that the local planning authority seek submission of the further bat survey information in order to be able to understand whether site specific mitigation measures are required and should be secured by condition.

Protected Species – Reptiles

A reptile survey on part of the site has been undertaken. This produced a smaller species list for the site than the earlier Ecological Assessment undertaken by Ecology Solutions (ref: 7464.EcoAss.vf1, February 2018) for an earlier application (180596) that covered this site also. The Ecology Solutions survey was particularly interesting in that it observed the presence of Adder (*Viper berus*) on site. This record indicated a local population that was otherwise unrecorded and is likely distinct from other populations known within the borough.

Of the widespread species, Adders are the least likely to take up and use artificial refugia and so run the risk of being under recorded in surveys. It may be relevant to adapt surveys to better target this species. They also show marked seasonality in habitat use (although females tend to be more sedentary). A key season to target to consider the implications of development on this species is late winter and early spring in order to look for hibernation sites.

Whilst the reptile survey appears to have followed the general reptile survey method, I am concerned that it may not have adequately checked for the potential presence of Adder on site, particularly for use of the site for hibernation. If Adders are still using the site then this would significantly elevate the importance of the site because of the rarity of this species – which is declining at a national level. At the moment I am not convinced that the site is only of local value for reptiles. I am not convinced that the impact of the development on reptile species of principal importance has been adequately assessed.

I recommend that the local planning authority seek further information to justify the evaluation of the site for reptile species and show that favourable conservation status of species of principal importance will be maintained.

Species Specific Enhancements and Ecological Permeability

The Ecological Assessment does not make any species specific enhancement recommendations or recommendations to maintain ecological permeability, as relevant to local plan policy TB23 and appropriate to seek under the NPPF.

I recommend that this development should include bat and bird boxes plus targeted measures for invertebrates, amphibians, reptiles, and hedgehogs. However, I accept that the detail of such appropriate enhancement and permeability measures could be resolved via a suitably worded condition. At this stage, there is still detail

on some species to be submitted and it may be relevant to tailor a wording pending that further information so I shall not recommend a wording below. However, a wording can be supplied should the local planning authority be minded to grant permission before the further information is supplied.

Conditions & Reasons (if required)			
Awaiting further information			
Date:	11 December 2024	Signed:	D. Fisher