

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	260209
Address:	Highfield Park, Eversley Road, Arborfield, RG2 4PP.		
Proposal:	Full application for the change of use of land to a residential caravan site comprising the siting of seven static caravans for residential occupation, alongside ecological enhancements and associated ancillary works, utilising the existing vehicular access.		
Type of Development:	Minor Gypsy and traveller pitches (1-9)		
Site Visit Made:	Yes – 24 th March 2026		

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

The applicant has submitted the following documents in support of this application:

- Pre-Development Habitats Plan, no date or author.
- Great Crested Newt Statement, January 2026 by Stuart H Carruthers
- Small Sites Metric Tool, 26th January 2026 by Stuart H Carruthers

Context

The proposed application relates to the change of use of land to residential use to accommodate seven static caravans. A site visit was undertaken to gain an overview of the site, although a detailed UK Habitat classification survey and condition assessments were not undertaken as part of this visit, the purpose was to understand the site context and existing land cover. The site comprises an access track with intermittent vegetation, interspersed with areas of concrete hardstanding and a watercourse ditch running the length of the northeastern boundary. The proposed location of the static caravans is characterised by open grassland, with areas of dense scrub, sections of longer sward grassland, and several strands of trees across the site. Photographs taken during the site visit are shown in Table 1 below to illustrate these features.

Table 1: Photos from site visit on 24th March 2026

Entrance of access track	Section of access track	Watercourse ditch north-eastern boundary alongside access track
		
¼ way in to access track	Flooded section of track due to blocked ditch	Open space grassland located on the northern section of the location plan.
		
Varied sward grassland, scrub and trees	Short sward grassland	Scrub and strands of trees.



The information provided is not sufficient to assess this full application in relation to relevant planning policies. Reasons why the information is insufficient and what is required to enable a full assessment is as follows:

1. Mandatory Biodiversity Net Gain, mandated under Environment Act 2021.

Mandatory Biodiversity Net Gain is required under the Environment Act 2021. The location plan (Drawing 4444_arb dated 07/06/2021) identifies the site boundary with a red line. Measurement using ArcGIS indicates the site extends to approximately 1.65 hectares. However, the applicant's ecologist has submitted a Small Sites Metric dated 26 January 2026, which states the site area as 5,250 m². This is incorrect and significantly understates the size of the site.

In addition to the incorrect area, the Small Sites Metric is not an appropriate metric for this development. The Small Sites Metric User Guide (DEFRA, 3 July 2025) confirms that this metric may only be used for developments of 1–9 dwellings on sites of 1 hectare or less, or for sites under 0.5 hectares where the number of dwellings is not yet known. While the proposal is for seven dwellings, the site exceeds 1 hectare and therefore requires assessment using the Statutory Biodiversity Metric. This must be supported by condition sheets obtained from a UK Habitat Classification survey. As the incorrect metric has been used and no condition sheets have been provided, the biodiversity baseline cannot be determined.

The submitted Small Sites Metric further misrepresents the existing site conditions. The applicant ecologist states that the entirety of the site comprises hardstanding, with scrub present but allegedly “not rooted in the hardstanding”. No evidence has been provided to support this claim. Bramble scrub (*Rubus fruticosus* agg.), which was present during the site visit and is evidenced in Table 1, is a well-known and widespread coloniser of disturbed and waste ground, including hardstanding. It can establish rapidly, often colonising substrates within a matter of months (Botanical Society of Britain and Ireland, unknown). As such, the assertion that the scrub present is not rooted in hardstanding is unsupported and inconsistent with botany records.

A site inspection confirmed that hardstanding is limited and intermittent, with large areas of grassland habitat, dense scrub, sparsely vegetated land, a watercourse ditch, and several trees present across the site. These habitats are clearly visible on site and within the submitted photographs, yet they have not been appropriately recorded within the metric.

Additionally, multiple trees on site have not been assessed for their potential to support roosting bats and are entirely absent from the Small Sites Metric. Without evidence to demonstrate that these trees do not support roosting bats, the presence of European Protected Species cannot be excluded. The Small Sites Metric User Guide confirms that this metric must not be used where European Protected Species are present or may be present, further demonstrating that the Small Sites Metric is inappropriate in this instance.

The applicant has also submitted a 'Pre-development Habitats Plan' which does not align with the UK Habitat Classification system. Habitats such as 'concrete road' and 'damaged land' are not recognised UK Habitat categories. The plan also identifies extensive areas of hardstanding, which is not supported by the submitted photographs; notably, none of the photographs show hardstanding, and 'damaged land' does not exist as a valid habitat classification. Consequently, habitats that are present on site have not been recorded, while incorrectly defined habitats have been included.

In summary, the applicant ecologist has applied an incorrect metric, recorded an inaccurate site area, failed to identify habitats present on site (including those clearly visible in photographs), and submitted habitat classifications that do not comply with the UK Habitat Classification system. As a result, the biodiversity baseline cannot be determined, and the proposals do not demonstrate compliance with the Environment Act 2021. Furthermore, the submitted metric shows no biodiversity net gain, which conflicts with the Wokingham Core Strategy and the National Planning Policy Framework (2024, Chapter 15: Conserving and Enhancing the Natural Environment), both of which require development to deliver net gains for biodiversity. As submitted, the documentation does not allow for a full or robust assessment and fails to comply with both local and national policy requirements.

To comply with mandatory Biodiversity Net Gain requirements, the applicant must submit the statutory Biodiversity Metric accurately reflecting baseline habitats, supported by a UKHab baseline habitat plan and completed baseline condition sheets. A post-development habitat plan and completed post-development condition sheets must also be provided, clearly illustrating proposed habitat changes and demonstrating how the required biodiversity net gain will be achieved. The submission of this information is required to justify the proposed habitat condition scores and to ensure that any Biodiversity Net Gain condition is robust, deliverable and compliant with statutory requirements.

2. Protected Species Wokingham Core Strategy Policy CP7: Biodiversity; Wildlife and Countryside Act 1981; Conservation of Habitats and Species Regulations 2017

The applicant has not submitted a full Preliminary Ecological Appraisal (PEA) assessing the impacts of the proposed development on biodiversity or identifying mitigation measures necessary to ensure compliance with relevant legislation and national planning policy. This is contrary to the British Standards: Biodiversity – Code of Practice for Planning and Development. Instead, the ecological information provided is limited to separate badger and great crested newt (GCN) reports, which do not provide a comprehensive assessment of protected and priority species on site.

Badgers

The submitted badger report states that a walkover survey was undertaken on 19 December 2025 and no evidence of badger activity was recorded at that time. However, the ecologist acknowledges that the site has potential to support badgers. Given the presence of mounds, hedgerows and areas of scrub, it is reasonable to conclude that the site is likely to be used by badgers. In order to ensure compliance with the Protection of Badgers Act 1992, should the Local Planning Authority be minded to approve the application, a badger condition is recommended to avoid harm to this protected species during construction.

Bats

All bat species and their roosts are protected under the Wildlife and Countryside Act 1981 and the Conservation of Habitats and Species Regulations 2017. Several bat species are also listed as species of principal importance under Section 41 of the NERC Act 2006. It is an offence to deliberately capture, injure or kill a bat, or to damage or disturb a breeding or resting place.

The application site contains several trees; however, these have not been recorded or assessed. A number appear to be mature and likely to provide bat roosting features. No Ground-Level Preliminary Roost Assessment has been undertaken and, as a result, the potential impacts of the development on bats, a European Protected Species, have not been assessed. TVERC records indicate that multiple bat species are present in the surrounding area, and therefore bat presence on site cannot be ruled out.

A Preliminary Roost Assessment of all trees within the site, identifying any to be removed and setting out appropriate mitigation, is required. In the absence of this information, the proposal fails to demonstrate compliance with relevant legislation.

Stag Beetles

Records show stag beetles have been recorded within 40 metres of the site. Stag beetles are a species of principal importance under the UK Biodiversity Framework. The site contains areas of grassland and deadwood, present along the flooded section of the access track and adjacent waterway, which could provide suitable habitat for this species. As the applicant ecologist has

not assessed the site's suitability for stag beetles, the potential impacts remain unknown. Consequently, the proposal fails to comply with Wokingham Core Strategy Policy CP7, which requires development affecting species of principal importance to demonstrate that the need for the development clearly outweighs the need to safeguard biodiversity. This has not been demonstrated.

Breeding Birds

Under the Wildlife and Countryside Act 1981, it is a criminal offence to damage or destroy the nest of any wild bird while it is in use or being built. The submitted ecological information does not assess the potential impacts of the proposed development on breeding birds, and therefore compliance with national legislation has not been demonstrated.

Required

A full Preliminary Ecological Appraisal is required to assess the potential impacts of the proposed development on protected and priority species and to demonstrate compliance with local and national biodiversity policy and legislation. In its absence, the application cannot be supported on ecological grounds.

3. Thames Basin Heath, Special Protection Area (SPA).

This proposed development is located within the 5 km linear mitigation zone for the Thames Basin Heath Special Protection Area (SPA), a nationally designated site. In accordance with Policy CP8 – Thames Basin Heath of the Wokingham Core Strategy, the proposed increase of one or more net additional dwellings must be appropriately assessed and provide a financial contribution toward the maintenance and protection of the SPA.

Paragraph 4.49 of Policy CP8 states:

“The Appropriate Assessment indicates that to ensure development avoids likely significant impacts upon the SPA, the following principles will apply:

i) Dwellinghouses and other residential development (including staff accommodation in Use Class C2) must provide avoidance and mitigation measures where:

a. The proposal involves one or more net additional residential units within 5 km (linear) of the SPA. Contributions toward on-site SPA access management measures and monitoring, in line with the Delivery Framework, will be required, along with the provision of SANG at a minimum of 8 ha per 1,000 population (calculated at a rate of 2.4 persons per household). This monitoring includes assessing the effectiveness of the SANG.”

As this proposal involves additional permeant residential development within the 5 km mitigation zone, the applicant will be required to provide a financial contribution toward the maintenance of existing Suitable Alternative Natural Greenspace (SANG), to be managed in perpetuity as an alternative recreational area to the SPA. In addition, a contribution toward Strategic Access Management and Monitoring (SAMM) will also be required.

These SAMM contributions will be secured through a Section 106 Agreement.

Summary

- A revised Statutory Biodiversity Metric using the correct site area and not the Small Sites Metric
- A UK Habitat Classification survey covering the full site
- A UKHab baseline habitat plan with completed baseline condition sheets
- A post-development habitat plan with completed proposed condition sheets
- A Biodiversity Net Gain calculation demonstrating at least 10% net gain
- A full Preliminary Ecological Appraisal (PEA) that includes assessment of stag beetles, breeding birds and other protected species, with mitigation where required
- A bat Preliminary Roost Assessment of all trees on site
- Confirmation of Thames Basin Heaths SPA mitigation, including:
 - SANG and SAMM financial contributions
 - Section 106 agreement to secure SPA mitigation

Botanical Society of Britain and Ireland (unknown). 'Rubus fruticosus L. agg., Bramble'. Online. Available from: Rubus fruticosus – BSBI Website.

Conditions & Reasons (if required)

Pre-commencement: Ecology updated surveys

No development and groundworks shall take place until an updated ecological survey for badgers and water voles has been undertaken, and a report submitted to and approved in writing by the Local Planning Authority. The survey shall be undertaken no more than six months prior to the commencement of development. The report shall detail the methods, results and a discussion on the survey, and include recommendation measures for any working practices or other mitigation measures.

Reason: To ensure that any working practices or other mitigation measures are informed by up-to-date survey information in the interests of protecting biodiversity. This condition is applied in accordance with the National Planning Policy Framework and to comply with the Badger Protection Act 1992, the Wildlife and Countryside Act 1981 and the Wokingham Core Strategy, Policy CP7: Biodiversity to protect priority species.

Further conditions may be required; however, due to the absence of sufficient baseline ecological information, it is not currently possible to secure these conditions until ecological constraints and impacts have been properly assessed.

Date:

08/04/26

Signed:

L.Aparo