

11 February 2026

Our Ref: RSE_7728

Louis Jones
Marrons Planning

Issued by email only

RE: LAND OFF BASINGSTOKE ROAD, SPENCERS WOOD (APP NO: 250517)

ECOLOGICAL IMPACT ASSESSMENT & BIODIVERSITY IMPACT ASSESSMENT TECHNICAL ADDENDUM NOTE

Dear Louis,

BACKGROUND

Richborough (the Applicant) submitted a hybrid planning application to Wokingham Borough Council (WBC) for a mixed-use development (the Scheme) at land off Basingstoke Road to the south and west of Spencers Wood (the Site). The planning application was validated by WBC on 20th May 2025. To inform the planning application, RammSanderson Ecology Ltd (RammSanderson) submitted an Ecological Impact Assessment (EclA) report and Biodiversity Impact Assessment (BIA), which identified a comprehensive ecological baseline for the Site and proposed proportionate avoidance, mitigation and compensation measures.

WBC's Ecology Officer, Mr Duncan Fisher, formally commented on the RammSanderson EclA and BIA on 7th July 2025 and requested further information on several matters prior to determination. This document prepared by RammSanderson provides a formal response to Mr Fisher's comments in the form of a EclA and BIA Technical Addendum Note. It is my understanding that the following concerns identified by Mr Fisher have or will be dealt with by separate submissions alongside RammSanderson's Technical Note:

- Thames Basin Heaths SPA (air pollution impacts).
- Stanford End Mill and River Loddon SSSI (air pollution impacts).
- Sustainable Alternative Natural Greenspace (SANG).
- Skylark Mitigation Strategy.

BIODIVERSITY NET GAIN AND IRREPLACEABLE HABITATS

The Statutory DEFRA Metric has been updated and reissued by RammSanderson with associated Baseline and Post-Development Visualisation Plans, based on the updated Illustrative Landscape Masterplan (Pegasus) and SANG Landscape General Arrangement Plans (EPR). In addition, following the comments made by Mr Fisher, the below amendments have also been made to the updated Metric and associated plans:

- All tree numbers now follow those specified within the submitted Arboricultural Impact Assessment report (EDP).
- All trees identified as 'veteran' by Mr Fisher (and as identified in within the submitted Arboricultural Impact Assessment report) have been classified as 'irreplaceable habitats' within the Metric. The 'veteran trees' are to be retained within the Scheme therefore a bespoke approach is not required.
- No arable margins were identified at the time of the baseline survey therefore such features are not included within the Metric.
- Lengths of hedgerow along the eastern boundary have been included within the Metric in accordance with the submitted Arboricultural Impact Assessment report.
- The Applicant's drainage consultant has confirmed there is no surface water culvert within the Site.

Following the identified updates, the Headline Results of the submitted Metric have calculated (Figure 1):

Figure 1 Updated Metric Headline Results

FINAL RESULTS				
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)		Habitat units	9.85	
		Hedgerow units	4.68	
		Watercourse units	0.65	
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)		Habitat units	12.22%	
		Hedgerow units	15.56%	
		Watercourse units	55.73%	
Trading rules satisfied?		Yes ✓		
Unit Type	Target	Baseline Units	Units Required	Unit Deficit
Habitat units	10.00%	80.60	88.67	0.00
Hedgerow units	10.00%	30.08	33.09	0.00
Watercourse units	10.00%	1.17	1.29	0.00
				No additional area habitat units required to meet target ✓
				No additional hedgerow units required to meet target ✓
				No additional watercourse units required to meet target ✓

The Metric has identified a post-development 10% BNG in the Habitat, Hedgerow and Watercourse Unit modules based on the updated Illustrative Landscape Masterplan (Pegasus) and SANG Landscape General Arrangement Plans (EPR) – see Appendices 1a and 2. The statutory requirement for 10% BNG has been achieved and the Trading Rules met.

The Scheme is required to deliver SANG as part of its wider ecological mitigation. DEFRA guidance has identified that SANG provision cannot provide the entirety of BNG for any development scheme¹. This guidance states that SANG provision must only contribute 'in part' and can only serve to secure ≤100% (100% represents the current site baseline) of the 110% BNG requirement. To facilitate this, RammSanderson have updated a strategic review of the overarching Scheme and separately identified the biodiversity unit provision within the SANG in isolation via GIS mapping and a separate Metric. In doing so, it is confirmed that the SANG biodiversity unit delivery for the Habitat, Hedgerow and Watercourse modules are below 100% and the total biodiversity unit contribution for the Scheme and is therefore policy compliant. Table 1 below provides an updated summary breakdown of the Scheme to demonstrate the relative contribution of the SANG provision to the Scheme's total BNG provision.

Table 1: SANG BNG Provision to Total Scheme BNG Provision

Module	Baseline Units (100%)	Units Requirement to Achieve 110%	Actual Unit Delivery	Unit Contribution of SANG in Isolation	Comments
Habitats	80.60	88.76	90.45 (12.22%)	46.97	SANG delivers below the 100% position and is therefore policy compliant.
Hedgerows	30.08	33.09	34.76 (15.56%)	10.11	SANG delivers below the 100% position and is therefore policy compliant.
Watercourses	1.17	1.29	1.82 (55.73%)	0.00	SANG delivers below the 100% position and is therefore policy compliant.

BATS

Mr Fisher requested the following changes in respect of a commuting corridor for bats along the northern Scheme boundary:

"I agree that the assemblage of bat species recorded on-site is not of county significance. The use of the northern perimeter of the site by Barbastelle bat is important, though. This species is classified as vulnerable in England under IUCN classification and it will be important to assess the impact of the proposals on the local conservation status of this species carefully. I agree that currently the site is likely only of interest to the species as a commuting route. This is a light sensitive species and vegetated boundary likely provides a dark corridor between parkland (to the West) and the river Loddon (to the East). The mitigation proposals are to strengthen the vegetated corridor along the northern boundary in order to retain a commuting corridor between the new development and the existing development to the North. I accept that this could be possible but I am concerned that the current Parameters Plan and Illustrative Landscape Masterplan do not show the space being reserved for this mitigation measure. It would be helpful to have an example cross section of how the wildlife corridor

¹ <https://www.gov.uk/guidance/what-you-can-count-towards-a-developments-biodiversity-net-gain-bng>

is proposed to be retained and enhanced at this stage to set the minimum standard when it comes to future detailed design at reserved matters”.

RammSanderson can confirm that the Applicant's submissions plans have been updated and now show a continuous green corridor along the northern boundary of the Scheme which directly connects to the SANG to the east and other areas of open green space to the west. For reference, the updated Illustrative Landscape Masterplan is presented in Appendix 1a of this letter report together with a cross-section of the green corridor (Appendix 1b) indicating how it is proposed to be retained and enhanced.

Mr Fisher also made the following comment in respect of higher quality potential bat roosting trees (PRF-M) proposed to be retained within the Scheme:

“I note that five trees on-site have been assessed as having ‘M’ type potential roosting features. The current proposals seek to retain these trees. However, I am concerned that the Parameter Plan and Illustrative Landscape Masterplan show that these trees could well become fragmented and subject to artificial lighting associated with adjacent development. Whilst the mitigation strategy recommends strengthening the vegetation and wildlife corridor along the northern perimeter of the site, I am not convinced this is achievable within the space that the Parameter Plan and Illustrative Landscape Masterplan allow. It would be helpful to have more detail as to how the PRF-M trees will remain connected to commuting and foraging corridors for bats”.

Appendix 3 of this letter report identifies the location of PRF-M trees within the Site. By way of their location within the enhanced continuous green corridor along the northern Scheme boundary, PRF-M trees T5 & T6 will be connected to other areas of open green space to the east and west and thereby bat foraging habitats, avoiding fragmentation. PRF-M trees T7 & T8 are located within a retained hedgerow on the northern boundary of the proposed SANG with a continuous green corridor enveloped around the hedgerow boundary. T7 & T8 will therefore remain connected to foraging habitat to the south, east and west and would not become fragmented. PRF-M tree T2 is located within the southern area of the Scheme, save for vehicular access through the hedgerow in which the tree is located and would be retained as would its connections to other areas of open green space and thereby bat foraging habitat. T2 is located directly adjacent to the existing Basingstoke Road and is thereby likely to be impacted by artificial light spill from streetlights which would be a limiting factor to the presence and movement of roosting bats in this location.

Should you have any queries, or require any clarifications, please do not hesitate to call me directly.

Yours sincerely,

Steven Weber

Mobile: 07302 006126

Email: s.weber@rammsanderson.com

For and on behalf of RammSanderson Ecology Ltd.

Enclosures:

Appendix 1a: Illustrative Landscape Masterplan

Appendix 1b: Illustrated Landscape Section Bat Corridor

Appendix 2: SANG Layout

Appendix 3: Ground Level Tree Assessment Plan (Roosting Bats)

APPENDIX 1A: ILLUSTRATIVE LANDSCAPE MASTERPLAN



23/01/2026 C Updated to reflect latest Development Framework Plan and SANG design
DATE NO REVISION NOTE

PLANNING

Figure 5.9: Illustrative Landscape Masterplan

Land off Basingstoke Road, Spencers Wood, Wokingham

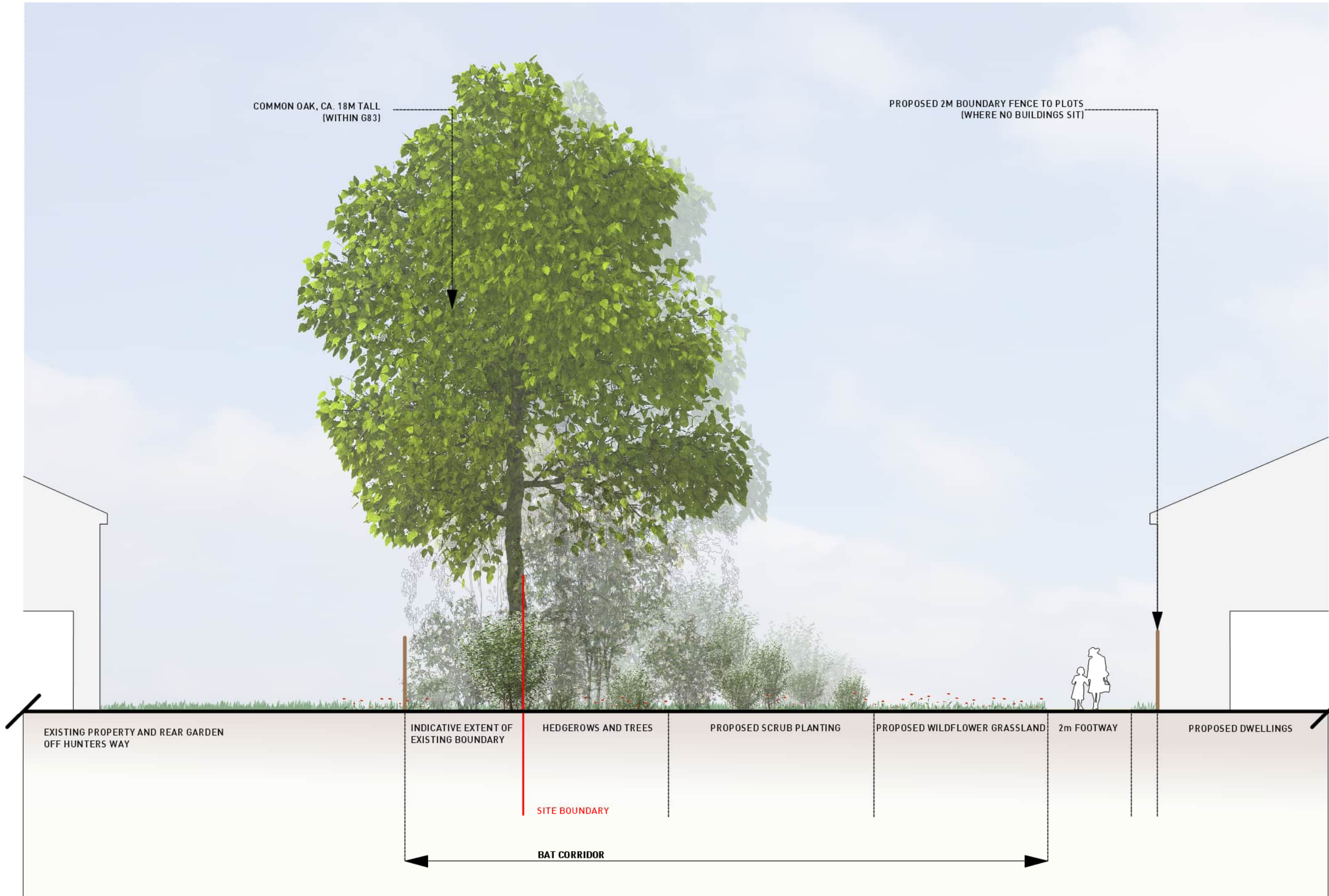
CLIENT
Richborough

DATE 22/07/2025 SCALE 1:5000 @A3 TEAM RB/JW APPRVD JWA

DRAWING NUMBER
P23-2449_EN_0009_C_ILMP

PEGASUS GROUP

APPENDIX 1B: ILLUSTRATED LANDSCAPE SECTION BAT CORRIDOR



13/08/2025 - First Issue
DATE NO REVISION NOTE

Illustrative Landscape Section Bat Corridor

Land off Basingstoke Road, Spencers Wood, Wokingham

CLIENT
Richborough

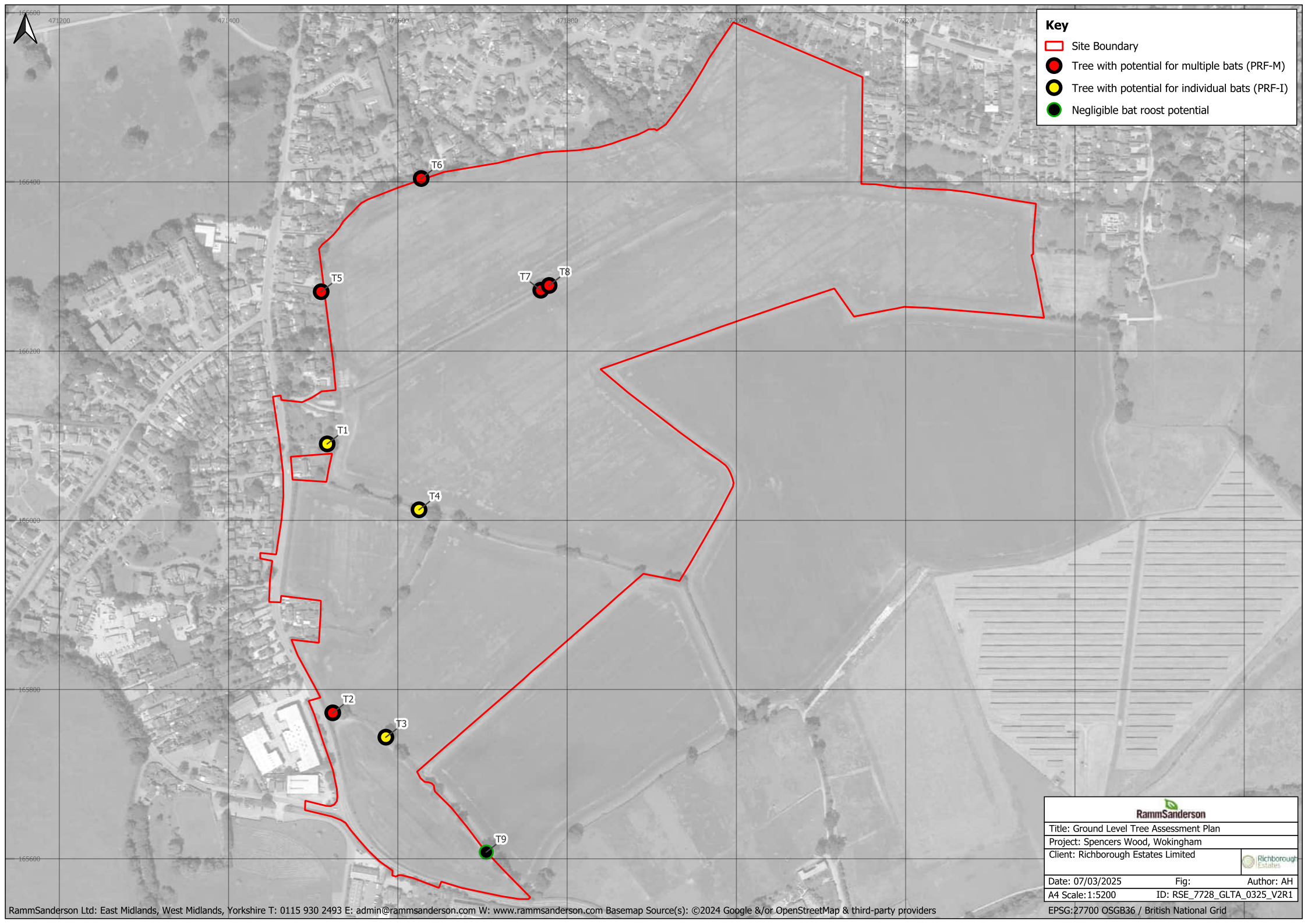
DATE 18/08/2025 SCALE NOT TO SCALE@A2 TEAM RB APPRVD JWA

DRAWING NUMBER

P22-4321_EN_0013_-_ LS

APPENDIX 2: SANG LAYOUT

APPENDIX 3: GROUND LEVEL TREE ASSESSMENT PLAN (ROOSTING BATS)



Key

Site Boundary

Tree with potential for multiple bats (PRF-M)

Tree with potential for individual bats (PRF-I)

Negligible bat roost potential

RammSanderson

Title: Ground Level Tree Assessment Plan

Project: Spencers Wood, Wokingham

Client: Richborough Estates Limited

Date: 07/03/2025

Fig:

Author: AH

A4 Scale: 1:5200

ID: RSE_7728_GLTA_0325_V2R1

Richborough Estates