

Emy Circuit

From: Guoda Vaitkeviciute [REDACTED]
Sent: 25 July 2025 16:39
To: Emy Circuit; Sophie Morris
Cc: Tom Pike; Jean Mulovi; Kane White; Connor Corrigan
Subject: SWDR - Conditions 12, 13 and 15 (Application Reference: 250213) and 5 and 6 (Application Reference: 242838)
Attachments: WMHP-TG-SRWG1-SK-DD-0594-P01 - DITCH PROFILES.pdf; 4977_Response to Consultee Comments 5 and 6_v1.2_20.06.2025.pdf; 4977_LAN_XX_XX_RP_L_1000 Written Landscape Specification P04 - Tracked.pdf; 4977_LAN_XX_XX_RP_L_1000 Written Landscape Specification P04.pdf; 4977_LAN_XX_XX_RP_L_1001_Landscape Management Plan P05 - Tracked.pdf; 4977_LAN_XX_XX_RP_L_1001_Landscape Management Plan P05.pdf; 4977_SWDR_Biodiversity Net Gain Report (tracked changes)_BW_V4-0.pdf; 4977_SWDR_Biodiversity Net Gain Report_BW_V4-0.pdf; 2025_07_22 EA responseconds 5_6.pdf; Environment Agency response 2025_07_04 conditions 12, 13 & 15 250213.pdf

WARNING!

For the attention of
WBC, Optalis, WHL, BCSolutions and
Councillors

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Good afternoon,

Please find attached the Applicant's responses to the comments received from the Council's Landscape Officer and the Environment Agency (attached for reference) in respect of Conditions 12, 13, and 15 (application reference: 250213).

For ease of reference, we have provided both a 'clean' and a 'tracked changes' version of each document to clearly show the revisions made.

These documents are also available here:

Condition 12: [Revised Information 25.07.2025](#)

Condition 13: [Amended Information 25.07.2025](#)

Condition 15: [Amended Information 25.07.2025](#)

Item	EA Comment	Lanpro Response
Condition 12		
1.1	<p>We do not consider condition 12 can be discharged due to the removal of the large deadwood habitat which was previously going to be placed into the backwaters to create habitat diversity. The applicant refers to this in relation to condition 13 saying deadwood hedges have been introduced as a suitable alternative. We appreciate the inclusion of this dead hedge as a natural alternative to fencing but it is unclear how this will provide the same, or similar habitat to the deadwood in the backwaters.</p> <p>We request that the applicant provides reasoned arguments as to why the large deadwood has been removed from the backwaters, with evidence showing how the dead hedges will provide the same, or similar habitat enhancements. It would be helpful if the applicant confirms what consultee comments they are referring to which has driven this revision.</p> <p>Alternatively, the large deadwood should be reinstated.</p> <p>Large wood within the backwater creates flow diversity and spawning areas for fish. These hedges being created on the banks of the backwaters are unlikely have the same ecological benefits as large deadwood at water level, and across more than 50% of the backwater.</p> <p>Large deadwood in the backwater can provide great habitat enhancements, so we encourage this to be included and are disappointed this has been removed.</p>	<p>During the previous consultation process and a meeting held on 7th April 2025 between ourselves, the EA and the LPA it was agreed that the deadwood habitat would be removed from the scheme in favour of providing a more diverse backwater profile with varying depths and shelves alongside the dead hedges. Additionally, the deadwood habitats could create present a hazard during a flood event if the deadwood would become dislodge from the backwaters and block any narrow water points such as bridges.</p>
1.2	<p>Drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026 – We think the scrape shown immediately north of the road bridge is unlikely to be full of water all year as it is not connected to the river. We have no concerns with this but we advise that the planting proposals should reflect that.</p>	<p>The proposed planting mix contains species that are suitable for both wet and seasonally wet conditions and are therefore acceptable for this situation.</p>
1.3	<p>In the Highways Soft Landscaping Planting Plan Sheet 2, drawing number WMHP-TG-SRWG1-DR-LS-3002 Rev P11, the northern most backwater still crosses the cable buffer zone. If this is acceptable to the council and cable owner, then we have no concerns. In meeting on 07/04/25 this was raised so the applicant is aware of this issue and was addressing it as part of the design.</p>	<p>Noted. The cable diversion designs are not being undertaken by the Applicant. The cable diversion will be agreed/coordinated outside of the planning process, and the works are being undertaken by others.</p>
Condition 13		

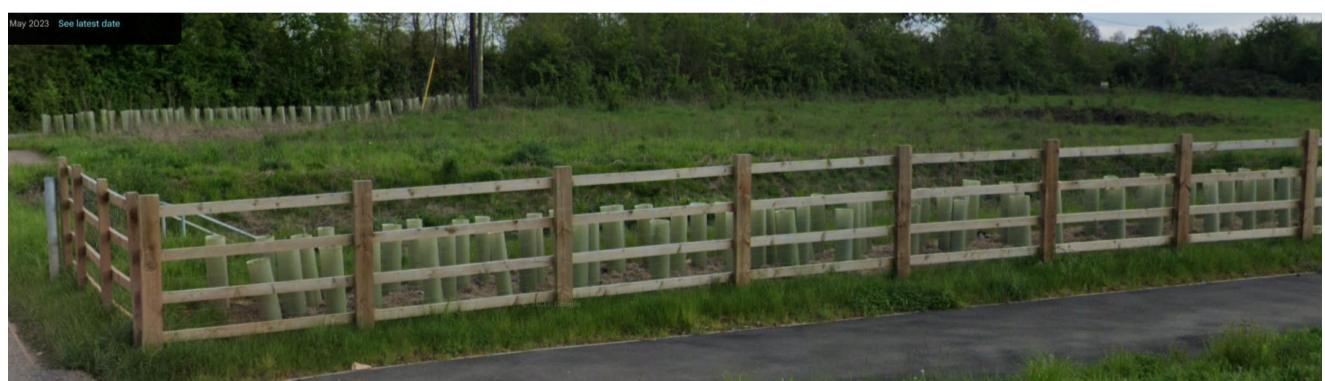
2.1	<p>It is still not made clear why the management period is only 11 years, rather than the required 30 for BNG purposes. It says in paragraph 1.1.6 'If the works are likely to have any long term ecological or habitat management implications then the LEMP will need to be reviewed to incorporate these new factors, with the amended document providing an update on this version.' The works will have long-term ecological and habitat management implications due to the requirement to secure any biodiversity net gain for 30 years. Therefore, this information needs to be included in the LEMP before this is approved.</p>	<p>The LEMP has been updated and reference to 11 years has been removed in Paragraph 1.14 and Paragraph 1.16 has been tweaked to reflect.</p>
2.2	<p>6.3.99 states 'Any failed plug planting or seeding will be topped-up until sufficient planting densities have been achieved. If particular species are failing, suitable alternatives will be used in replacement.' This has not referenced the use of native species of UK genetic provenance, so I will reiterate this comment.</p>	<p>The LEMP has been updated to reflect this comment.</p>
2.3	<p>It is stated in the response to condition 12, that the deadwood hedges are to prevent dogs from entering the river, not for ecological enhancement of the backwaters. Although the dead hedges will provide some ecological value, this will not be the same as large wood within the backwater, so this cannot be compared as a suitable alternative. Large wood within the backwater creates flow diversity and spawning areas for fish. These hedges being created on the banks of the backwaters are unlikely have the same ecological benefits as large deadwood at water level, and across more than 50% of the backwater. Please can it be confirmed the ecological benefits to the backwaters that the deadwood hedges will provide, which is comparable to the ecological benefits of large deadwood in the backwater. We would like to know what the comments were from consultees that meant the large deadwood has been omitted. Large deadwood in the backwater can provide great habitat enhancements, so we encourage this to be included and are disappointed this has been removed.</p>	<p>Please see response to comment 1.1</p>
2.4	<p>6.3.106 states 'It is recommended that monitoring visits continue in spring (March/April) and summer (July/August) from year one onwards to assess the backwater and remove accumulated debris or silt that may block water flow from the Emm Brook or reduce habitat functionality within the backwater'. This is good but we would like more detail on how this silt/debris management will be conducted and how this will be disposed of.</p>	<p>The LEMP has been updated to include: Suitably qualified Ecologist to assess the backwaters and provide further recommendations as required. Due to the nature of the backwaters it is advised that all works to remove accumulated debris and silt is undertaken by hand to avoid unnecessary damage to establishing or established habitats.</p>
2.5	<p>Although in 6.3.112 and 6.3.113, the height and width of the berms and the slope, and monitoring at different times of year, is mentioned, there is no mention of expected water levels at each time of year. Nor is there any mention of cross sections for these berms. Additionally, the berms are very uniform all the way along. There should be variation in berm height and slope along the length of the channel.</p>	<p>Refer to drawing WMHP-TG-SRWG1-SK-DD-0594 submitted under Discharge of Condition 5 (Application Reference: 242838). This drawing is attached with this response for reference.</p> <p>The water level within the diverted Luckley Brook channel is expected to vary seasonally, ranging from dry conditions to full submergence of the channel. While we understand the ecological benefits of introducing variation in bench levels, this is not being considered as part of the current design. The principle of the channel remains on maintaining consistent conveyance and hydraulic performance within the channel, in consistency with the full planning application (reference: 192928). It is also understood this variation will generate naturally over time through the deposition of sediment.</p> <p>A similar arrangement has been approved and implemented at Eastern Gateway, Waterloo Road, Wokingham (upstream of the Emm Brook), which shows fast establishment of wildflowers that contribute to creation of variation in the ditch profile from the engineered design:</p> <p>Image 1: May 2023, showing where the headwall guardrails are clearly visible.</p>  <p>Image 2: August 2023, showing established wildflowers and headwall guardrails hidden:</p>



Image 3: August 2023, showing established ditch vegetation in short period of time giving variation to profile:



2.6	<p>6.3.128 states 'Himalayan balsam (<i>Impatiens glandulifera</i>) is known to be on-Site. Himalayan balsam should be removed by hand pulling before the plant flowers (spring). After pulling, break the root just above the lowest node to prevent regrowth. Pile pulled plants together (away from watercourses) to allow natural degradation. In areas of high plant density, use a strimmer, brush cutter, or mower to cut the plant as low as possible, ideally below the first node.' This is an acceptable way to manage Himalayan Balsam. However, the frequency at which this management is conducted needs to be clarified. If this is the only invasive species on site then this is fine, but we would like it confirmed that there are no other invasive non-native species on site and to see the surveys which were undertaken to determine this.</p>	<p>UK-70119179 - Wokingham SWDR Himalayan balsam Report v0.2- ISSUED (submitted as part of the CEMP under Condition 24, application reference: 242535).</p> <p>The management frequency of invasive species has been added to the LEMP.</p> <p>Regarding other invasive species, as outlined within the CEMP, a stand of Japanese knotweed has been identified outside the redline boundary. No works are proposed within the vicinity of the Japanese knotweed. Nevertheless, precautionary measures, as set out in the CEMP and the LEMP, are proposed.</p>
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Condition 15

3.1	<p>In paragraph 2.4.17 - if it is assumed that that habitats temporarily lost due to construction of the haul road would be restored, then there needs to be assurances that it will be restored to at least its current value. It needs to be planned into the programme of works how this will be achieved. There needs to be effective monitoring between start and end of temporary works.</p>	<p>This has not been included within the BNG assessment, as it was agreed that the works are temporary and will be reinstated to their existing condition and as such inclusion is not required. Please refer to BNG Report paragraphs 2.4.8 and 2.4.17.</p>
3.2	<p>It is helpful to separate each of the watercourses. However, this additional column is rather confusing. It is not clear what this is 'justification' of. It is not clear whether the information in the 'justification' column is the description of what is already in each watercourse or what will be done to achieve uplift proposed. If this is the actions which will achieve uplift, we need to know how this will provide the uplift and how these actions are going to be undertaken. If it is what is already there, we need to know what actions are going to achieve the proposed uplift.</p>	<p>It is the planned uplift. The justification outlines reasons for the score that is achieved. BNG Report has been updated to clarify.</p>
3.3	<p>Our comment was about creation of new culverts, not the baseline culverts. We do not encourage the creation of culverts as a rule and would ask for justification why they have been chosen over options which are more environmentally friendly, for example clear span bridges. We would also like to see cross and long sections of these culverts. Previous comments have been made under discharge of conditions 5 and 6 regarding design of culverts. They need to have as little impact on the ecological function of the watercourse as possible.</p>	<p>Please refer to the attached comments submitted as part of the responses to Conditions 5 and 6 (application reference: 242838), dated June 2025, which address the design of the culverts in detail.</p> <p>Please also note that this is a Discharge of Condition application, and the principle and location of the culverts were approved under the full planning permission (reference: 192928).</p> <p>EA's comments received on 22nd July 2025 in respect of Conditions 5 and 6 make no further comments in relation to culverts.</p>
3.4	<p>Again, this 'justification' column is not clear. See comments above. Additionally, we need to see cross and long sections of these created sections of watercourse.</p>	<p>As above.</p>

Item	Landscape Officer Comment	Lanpro Response
Condition 12		
1.1	Paragraph 8.1.1 on Implementation Timeframes will need to consider the phasing of the road. Some planting maybe achievable in the following planting season in areas where parts of the road have been completed. I suggest we shouldn't be waiting for the whole road to be completed before parts of the landscape scheme are implemented.	Comments are noted and additional text has been included in the Landscape Specification Document.
1.2	It is important to note at this point that the landscape contract should not be linked to the practical completion of the main construction works for the road. This is because it is likely that the road will be completed at a point in the year which is outside the planting season and it is essential that no planting is undertaken during this timeframe, but only during October – March which is the planting season, otherwise it is likely that much of the planting will not survive.	Comments are noted and additional text has been included in the Landscape Specification Document.
Condition 13		
3.1	The frequency of weed control around trees, shrubs and along the hedgerows as indicated in the Management Schedule will need to be greater than 1-2 times per annum, especially in the first 3 years. I would suggest this should be at least 4 times a year in order to control and manage weed growth which will inevitably compete with the plants we are trying to establish, for water and nutrients. The schedule will also need to include the additional weed control operation I have discussed in point 3 above.	Comments are noted and the LEMP has been updated to reflect these.

In addition to the above, please see below our response to the EA's comments (attached for reference) in respect of Conditions 5 and 6 (Application Reference: 242838).

No.	Summary	Consultee Comments	Comments Received / Actions
5.	Levels	Drawing number WMHP-TG-SRWG1-SK-DD-0594-P01 (Ditch Profiles) shows Section F-F through the diverted Luckley Brook as having benches on either side the excavated low flow channel, although there is no indication of the water level that would be expected in the summer months and therefore how wet/damp these benches would be. Some variation in level along these benches would be desirable to maximise ecological diversity, while not affecting the conveyance within the channel.	The water level within the diverted Luckley Brook channel is expected to vary seasonally, ranging from dry conditions to full submergence of the channel. While we understand the ecological benefits of introducing variation in bench levels, this is not being considered as part of the current design. The principal of the channel remains on maintaining consistent conveyance and hydraulic performance within the channel, in consistency with the planning application. It is also understood this variation will generate naturally over time through the deposition of sediment.
6.	Detailed design of roads	The applicant has confirmed that Culvert E is identified on plan WMHP-TG-SRWG1-DR-ST-0540 P01 South Wokingham Distributor Road culvert design plan layout (approved at the application stage) which has been superseded by drawing WMHP-TG-SRWG1-DR-DD-0534 - Culvert Location Plan. Culvert E is not a new culvert. The details for Culvert E are acceptable – we have no further comments with regard to this.	Noted
6.	Detailed design of roads	The applicant has indicated that the detailed design of these features are being considered under conditions 20 and condition 12. We will comment on those aspects via consultation on those conditions.	Noted
6.	Detailed design of roads	The applicant previously appeared to indicate and acknowledge that the road design had changed since the original flood risk modelling was carried out and approved. The Lanpro letter dated April	An update to the flood modelling for the SWDR is not required due to the reduced impact on the floodplain storage volume compared to the layout approved under the full planning

<p>2025, indicated that the changes had been assessed by their team who concluded that no further updates were considered necessary as the result provided either no change or a betterment in terms of flood risk and there was no intention to produce a new flood model.</p> <p>In response to our previous comments, the applicant has now responded to say that an application to discharge condition 14 (ES addendum) is supported by updated flood risk modelling and has been submitted for approval under reference 250018.</p> <p>The modelling submitted with condition 14 relates to the temporary haul road and not the SWDR as approved under application 192928 and the details requiring approval in relation to the construction of footways, cycleways and roads and surface water drainage as set out in condition 6.</p> <p>We need the applicant to clarify if the design of the SWDR and those matters they are seeking approval of under condition 6 have changed since flood risk was originally considered under application 192928 and whether they consider any changes significant enough to warrant an update to the flood model and flood risk assessment originally approved. We will need a detailed explanation if updates are not intended.</p>	<p>application (reference: 192928). The principal changes that resulted in a reduced impact as approved under a Non-Material Amendment (reference: 240738) are:</p> <ul style="list-style-type: none"> • Finchampstead Roundabout Redesign – The Roundabout at Finchampstead Road has been redesigned and reduced in size to match the existing roundabout footprint, this is a reduction from the larger roundabout in the planning approved design moving the scheme extents further from the Emm Brook and increasing the storage volume within the flood plain. • Reduction in size of catchment 3 Basin – Catchment 3 basin which sits to the north side of the alignment, between the mainline and the Emm Brook to the East of the new Tesco Roundabout was reduced in volume during design development • Catchment 4 Basin Redesign – Catchment 4 Basin which sits to the West of the Emm Brook, on the south side of the mainline alignment was modified in shape, but encroaches no further into the flood area. • Minor changes to culvert cross sections – through detailed design development and coordination with precast manufacturers some culvert dimensions have been amended, changes have been sensitivity tested within the flood model with changes considered unsubstantial.
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We trust that the above responses address all outstanding consultee comments in respect of Conditions 12, 13, and 15 (Application Reference: 250213), as well as Conditions 5 and 6 (Application Reference: 242838), and that the conditions can now be discharged.

Please let us know if you require any further information.

Kind regards,

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