

MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251160
Address:	Land At Rear Of, 6 Johnson Drive, Finchampstead, Wokingham, RG40 3NW.		
Proposal:	Application for submission of details to comply with the following conditions of planning consent 233086 dated 09/05/25. Condition 3 relates to ground and building levels; 6 to highway construction details; 7 to access construction; 9 to cycle parking; 11 to a Construction Environmental Management Plan (Biodiversity); 12 to ecological enhancement; 13 to biodiversity gain; 14 to a Habitat Creation Management and Monitoring Plan; 15 to landscape proposals; 16 to a Landscape and Ecological Management Plan; 17 to protection of trees; 19 to a Sustainable Urban Drainage System; 20 to archaeology, and 23 to accessibility.		
Type of Development:			
Site Visit Made:	No		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☒ **Negotiate the amendments stated below; or**
- ☒ Request further information before determination as **stated below**
- ☐ Objection due to the reason(s) **stated below**

Comments On Proposal

I have reviewed the plans and reports submitted to discharge the above conditions. I am happy to recommend approval of conditions 6, 11, 12, 13, 17 and 19 and request the following changes to the management plans and proposals submitted to discharge conditons 3, 14, 15 and 16.

3 GROUND AND BUILDING LEVELS

Condition 3 requires that the applicant provides a measured survey of the site and a to scale plan showing details of proposed finished ground levels. The External Works Layouts (Beal, Ref 629:004 P1 5 February 2024) and (Beal, Ref 629:005 P1 5 February 2024) fail to include deals of the finished ground levels of the Wildlife Corridors, gardens of plots 1, 2, 3 and 6 and the northern wildlife area which is needed to assess the ecological enhancements and proposals for habitat creation

and maintenance of wildlife including badgers and reptiles populations. I request that a detailed plan of the proposed levels of whole redline site showing detail of proposed contours is submitted. The final levels should take account of proposals for reuse of soil and subsoil, the Materials Management Plan and the remediation proposals secured under condition 4, particularly where they affect the Landscape Wildlife Corridors and northern wildlife area.

7 ACCESS CONSTRUCTION & 17 PROTECTION OF TREES

The BS5837:2012 Arboricultural Method Statement (GHA/MS/169990:25, 13 February 2025) and Tree Protection Plan (Rev C, February 2025) have been submitted to discharge condition 7. Provided clearance and development is implemented in strict accordance with the AMS and phased tree protection plan, from an ecological perspective, I am happy to recommend approval of condition 7.

11 CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN (BIODIVERSITY)

I note that the line of the tree protection fencing Construction Exclusion Zone coloured yellow shown on the Reptile Proof Fencing Plan Dwg 2332392 Figure 2 is not consistent with the line shown in the Tree Protection Plan (Rev C, February 2025). Provided that Tree Protection Fencing is erected in accordance with TPP Rev C and the Construction Exclusion Zone is retained and protected until the landscape phase in accordance with Section 6 of the AMS GHA/MS/169990:25, I have no objection to the CEMP Biodiversity and the detail of the Reptile Mitigation and Enhancement Strategy.

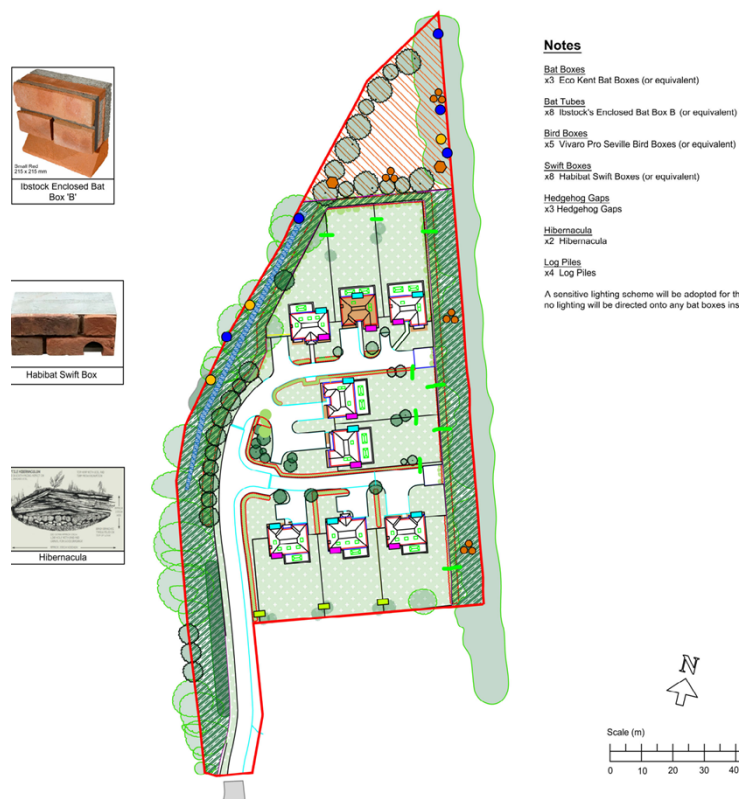
12 ECOLOGICAL ENHANCEMENT

Condition 12 wording includes the requirement for a timetable of implementation of the approved enhancement measures to also be approved. A timetable of implementation is not included in the submitted Biodiversity Enhancement Plan (BEP) report.

In order to recommend approval of the Biodiversity Enhancement Plan I request timetable that includes details of the habitat creation and enhancement measures proposed to be implemented in the Landscape Wildlife Corridor is appended or included in the BEP report.

The Annotated Site Plan (Figure 1) of the BEP report shows locations for hedgehog gaps. At the moment this is only showing connectivity between the three southern plots and not gaps being provided in all the closeboard fencing between plots.

In order to ensure adequate habitat connectivity and movement of hedgehogs throughout the development, the Annotated Site Plan should be amended to include at least one hedgehog gap in any close board fencing of each of the 8 units and not be limited to plots 1, 2 and 3. See the image snip below with missing hedgehog gaps marked in lime green.



Provide that these amendments are made I would be able to recommend approval of the BEP and discharge of condition 12.

13 BIODIVERSITY GAIN PLAN

I recommend approval of the Biodiversity Gain Plan and discharge of condition 13.

14 HABITAT CREATION MANAGEMENT AND MONITORING PLAN

It is good that the Habitat Management and Monitoring Plan (HMMP) is written using the Natural England template. This template is fairly new and so it is understandable that there is still a developing common ground of expectation for content of each box in the template. I recommend that the local planning authority should seek the following changes – with reference to the box codes to aid the update – in order to have an HMMP that is specific enough to track through the expected future monitoring events.

Summary of Management Plan

PB-B03 Timescales for Actions The timescale for actions does not take account that management and monitoring of biodiversity and hedgerow habitats should be undertaken for 30 years from issue of a Certification of Completion by the LPA. In effect, the initial landscaping is year 0. I recommend that PB-B03 is amended to identify the landscaping to be created in year 0 - Also see **PB-B01** which should take into account the completion year of the landscaping.

PB-B04 Monitoring Requirements. This section needs to identify the requirement to submit monitoring reports to the LPA – initially annually for the first years 5 and thereafter 5-yearly reports.

PB-B05 Required Consents and Licences PB-B05 needs to reference the Tree Preservation Orders covering the Landscape Wildlife Corridors and that future tree and woodland maintenance works may require separate tree works applications to be made to the LPA.

PB-B07 Add in the reference for the S106 Agreement (34000002/502) to aid ongoing reference.

PB-B08 Will the proposed work measures be delivered in phases?

Not necessary to complete as the site is not being delivered in phases.

The bullet points listed in this section should be within the relevant prescribed habitat creation works set out in the Creation Approach sections GH-T01, HD-T01, SC-T01, UT-T01 and UT-T02. The timing detail must be consistent with the requirements of the reptile mitigation strategy.

PB-B10 Landowner or Land Manager Within the responsibility section please confirm if Palatine Homes Limited are responsible for habitat creation and for securing the Certificate of Practical Completion from the LPA.

The end date needs to be amended to 30 years after the Certificate of Practical Completion has been issued.

PB-B11 Management Organisation Responsible for Implementing the HMMP I understand that responsibility for implementing the HMMP will be on Palatine Johnson Drive Limited. Relevant details need to be added in here.

PB-T01 Site Baseline, Environmental Information and Associated Impacts

Checklist PB-T01 needs to provide a reference for the contaminated land reports for the site.

PB-F03 Site Context Photos I recommend including additional site context photos showing the Landscape Wildlife Corridors. MS-B01 (within the monitoring schedule) specifies that photographs will be taken to track progress of habitat establishment. It will be relevant to be able to see what these key locations looked like before the intervention.

BI-T02 Protected and Notable Species As the completed landscaping will include bat and bird boxes, these species groups need to be included as relevant protected and notable species relevant to ongoing management. Compensation roosting opportunities will be provided and foraging and commuting activity and roosting must be maintained and enhanced.

BI-F01 Biological Records Plan - Sites and Species

This section needs to also include the (revised) BEP Annotated Site Plan to reference where reptile hibernacula and bird and bat boxes will be installed.

BI-B05 Habitat Degradation The removal of the Alder tree which was proposed be retained and earth works carried out in the northern landscape corridor were not

permitted under any previous planning permission. Tree and vegetation removal works have caused degradation in habitat to be retained and protected prior to installation tree protection fencing. This degradation needs to be recognised here.

BI-B06 The proposed bat boxes will provide adequate compensation for the loss of the high bat roost potential tree. This action can be used to account for the degradation to be recognised in BI-B05.

I agree that the Baseline Habitat Descriptions and Condition tables are consistent with the Technical Note: Ecology and Biodiversity Net Gain and the Biodiversity Metric.

PM-B01 Management Plan Aims and Objectives

This box has been completed incorrectly as it contains management prescriptions and not site-wide aims and detailed objectives. PM-B01 needs to be revised to list aims and objectives. It may be useful to extract the aims and objectives given in the Landscape Ecological Management Plan – in particular with reference to the objectives listed in Appendix C.

I am satisfied that table PM-T01 provides a summary of Habitat and Condition Targets set out in T01, HD-T01, SC-T01, UT-T01 and UT-T02.

EM-F01 Habitat Creation, Enhancement and Management Plan

In addition to the Proposed Habitat Plan included in the Technical Note: Biodiversity Net Gain (October 2025), the approved soft landscaping proposals and levels plans need to be included here to give the full picture of what is being created.

GH-T01 Grassland Creation, Enhancement and Management

GH-T01 and GH-T02 must be revised to include more detail in the habitat Creation Approach section – including details on timing, soil import, soil preparation, and agreed seed mix. Soils suitable to establish the neutral meadow grassland should not be nutrient enriched.

Within the Management Approach section, consideration needs to be given to the requirements of the Reptile Mitigation Strategy and the need to provide suitable habitat for reptiles. This needs to be integrated in the cutting recommendations.

HD-T01 Creation, Enhancement and Management and HD-T02 Creation, Enhancement and Management Methods

Within the Creation Approach section, reference needs to be made to timing, ground preparation, and the stock size and density approved in the Planting Plan TTL-SM-PHJD210200.

SC-T01 Creation, Enhancement and Management Summary and SC-T02 Detailed Methods

The details including time and soil importation and ground preparation to remove the eastern and western access roads and created scrub habitat in the east and west wildlife corridors must be included in the Creation Approach column of SC-T01 and Detailed Methodology for creation in SC-T02.

There is an action in SC-T02 to check canes, ties and guards. However, details of tree protection are not specified anywhere. Tree protection specification needs to be added.

UT-T02 Individual Trees Creation, Enhancement and Management Detailed Methods - Replacement Planting Replacement of losses to ensure 100% establishment by year 5 is good but the prescription also needs to cover what to do if there are losses after 5 years (to ensure presence of the habitat for the full 30-year period).

PM-T02 Habitat Creation and Management – Risk Register and Remedial Measures

I request that the local presence of a badger clan and potential for the expansion of the badger sett is included in the risk register. This introduces a risk that it is not possible to establish some of the habitats in the approved landscaping plan. The remedial measure need not be specified in detail in this HMMP but it is appropriate to specify a dialogue with the LPA to allow for HMMP adaptation.

Nutrient enrichment from garden waste needs to be added to the risk register.

Encroachment into the landscape wildlife habitats needs to be added to the risk register.

The introduction and colonisation of the habitats by garden plants needs to be added to the risk register.

MS-B01 Monitoring Strategy

Please include in the Monitoring Strategy a plan of the locations of the baseline photographs to allow for future monitoring reports to undertake comparative fixed-point photography.

Please confirm here if the template Progress Towards Habitat and Condition Targets tables will be used to report progress. If alternative monitoring record sheets are proposed please provide examples of them in this section.

MS-T01 Monitoring Methods and Intervals

Given that condition criteria A, B, D, E, and F are targeted to be passed for the wildflower meadow, more detail is required in this table to show how monitoring will check to see if these criteria are met (for instance the use of quadrat surveys to allow checking of species per m²). Monitoring against condition criteria need only be specified in the years that reporting to the LPA is required.

MS-B02 Adaptive Management Approaches

This section needs to make clear that the HMMP may not be amended without submission and written approval of a monitoring report by the LPA.

15 LANDSCAPE PROPOSALS

I do not object to the landscape proposals given in Drawing TL-SM-PHJD2102001 Rev F. However, it may be prudent to not discharge condition 15 until the site-wide details of proposed finished ground levels and proposed contours required by

condition 3 and requested as part of condition 15 have been submitted in order to be able to check and confirm that the planting is achievable.

16 LANDSCAPE AND ECOLOGICAL MANAGEMENT PLAN

I support approval of the Landscape and Ecological Management Plan (AAE, Ref 233292, May 2025) and recommend condition 16 can be discharged.

In Summary

Provided that the amendments are made and the omitted detail requested above is provide to fulfil the requirements of conditions

Conditions & Reasons (if required)

Date:	22/05/25 6 June 2025	Signed:	T Cuss Reviewed by D. Fisher
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