

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	252255
Address:	Unit 1, 171 Evendons Lane, Wokingham, RG41 4EH.		
Proposal:	Application for submission of details to comply with the following condition of planning approval 231351 dated 12.11.2024. Condition 3 relates to materials, 4 to ground and building levels, 6 to construction management, 9 to landscape details (large scale), 11 to protection of existing trees, 12 to landscape management plan, 13 to earth mounding and contouring, 14 to hedgerows, 15 to contamination, 17 to cycle parking, 18 to details of car and motorcycle parking, 20 to vehicle turning, 21 to construction access, 22 to access, 25 to travel plan, 26 to walking and cycling strategy, 27 to LEMP, 28 to ecological permeability, 29 to details of boundary walls and fences, 30 to noise impact assessment, 31 to odour extraction details, 32 to drainage, 35 to BREEAM compliance, 37 to communications plan, 42 to bat Licence.		
Type of Development:			
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

The documents reviewed in support of discharging these conditions relate to the granted outline planning permission and are also relevant to, and should be read in conjunction with, Reserved Matters Application 252179. The comments made in respect of these conditions, particularly those concerning ecological enhancements and Biodiversity Net Gain, are therefore also applicable to the Reserved Matters application

Condition 6: Construction Environmental Management

The Construction Logistics & Environmental Management Plan, Version 3, July 2025 by Larence Baker has been submitted to discharge this condition; however,

following review, further information is required before the condition can be discharged.

With regard to temporary lighting for works, the material storage facility is located in close proximity to an oak tree that previously supported a bat roost. Although recent surveys indicate the tree is not currently used as a roost, it retains moderate suitability for bat roosting and foraging. In addition, the adjoining hedgerow corridor was identified within the Ecological Appraisal as bat foraging habitat. Aside from a statement within the CEMP that lighting will face inwards on temporary storage shelters, no further details are provided. In particular, the CEMP does not specify lighting type, intensity, timing, or colour temperature. Lighting of inappropriate specification (e.g. high-kelvin floodlighting) may adversely affect bat roosting and foraging behaviour, even when directed inwards. Lighting specification is required to ensure compliance with the Conservation of Habitats and Species Regulation 2017 and Wildlife and Countryside Act 1981 making it illegal to disturb or harm bats, their roosts and resting places. Furthermore, as previously noted under the hedgerow condition, a minimum 10-metre buffer is required around hedgerows; consequently, the proposed storage facility will need to be relocated further from the hedgerow.

In relation to ecological mitigation for protected species (points xxvi–xxvii of Condition 14 of the Decision Notice), the CEMP fails to provide the necessary detail and therefore does not meet the discharge requirements. The CEMP states that:

“More detailed information on the ecological mitigation on the site can be found in the Landscape and Ecological Management Plan and all relevant mitigation detailed for the construction works will be put in place and signed off by the ecologist.”

However, the LEMP does not set out construction-phase mitigation measures for protected or priority species. As standard practice, the LEMP addresses post-construction landscape management, while the CEMP should provide detailed mitigation measures to avoid disturbance or harm to protected species during construction.

The Ecological Appraisal by Aspect Ecology (May 2023), submitted and approved at outline stage, identifies mitigation measures. A subsequent ecological memo confirmed the acceptability of these measures in principle but required further detail, which was the purpose of the CEMP condition. As the submitted CEMP does not provide these details, nor include plans identifying habitat protection areas, and as the LEMP does not contain the referenced mitigation measures, the condition cannot be discharged.

It is recommended that the CEMP be revised to include detailed, species-specific mitigation measures and their timing, informed by the Ecological Appraisal and in accordance with the planning memo by Duncan Fisher dated 7 December 2023.

Condition 14 hedgerows

The report submitted and reviewed to discharge this condition is the Hedgerow Mitigation and Compensation Strategy dated 21st August 2025, Revision C by Pioneer Environment. Condition 14 of the Decision Notice for outline planning permission 231351 requires buffer zones for retained hedgerows to be a minimum

of 10 metres, unless otherwise agreed in writing by the Local Planning Authority. Paragraph 4.3 of the Strategy, under “*Buffer Zones*”, states that buffers will be “*no less than 2 metres from the edge of the hedgerow*,” with widths increasing based on tree stem diameter as set out in the Arboricultural Report (Mark Welby, 20 August 2025). However, the Decision Notice clearly specifies a minimum 10-metre buffer for all hedgerows.

As there is no evidence of written agreement from Wokingham Borough Council to reduce the buffer width, the proposed 2-metre buffer does not comply with Condition 14. The buffer zones must therefore be amended to a minimum of 10 metres before this condition can be discharged.

Condition 27 LEMP

The Landscape Ecological Management Plan produced by Pioneer Environmental Group was submitted to discharge condition 27.

The LEMP provides up to date habitat assessment and Biodiversity Net Gain metric assessment, of which I agree with the baseline habitats and habitats proposed.

A minor inconsistency has been identified between the LEMP and the Arboricultural Report and the Ecological Appraisal approved at outline stage in relation to the oak tree located within Hedgerow 3 (H3). While both reports identify the tree as being retained and having bat features, the LEMP Proposed Habitat Plan does not show it as a retained large urban tree. To ensure consistency through all layout plans, the Proposed Habitat and Hedgerow Plan should align with the Arboricultural Plan.

A Biodiversity Net Gain Assessment (BNGA), dated 6 October 2025 and prepared by Pioneer Environment, was submitted in support of this condition to provide updated information on the proposed habitat creation. The BNGA is intended to inform the discharge of the LEMP and to accompany the associated Reserved Matters application.

The Statutory Metric submitted within the BNGA classifies areas of private lawn as ‘poor’ modified grassland. However, the Statutory Metric User Guide defines a private garden as land within the curtilage of a privately owned or tenanted dwellinghouse. When recording habitats at the post-development stage, gardens that have no public access and where biodiversity cannot be legally secured, should be recorded as ‘urban – vegetated garden’ or ‘urban – unvegetated garden’. Landscape Plans 1–5 prepared by ILJA (Revision P04) identify areas described as ‘private lawn’.

The Design Statement by RM Design Group, submitted under the Reserved Matters application 252179 directly states that these are private secure resident gardens and private patios. Where long-term management and condition cannot be secured through the HMMP, all such private ‘lawns’ should be recorded as ‘urban – vegetated garden’. Any reclassification of private lawns must be applied consistently across the BNGA and the LEMP and clearly shown on the Biodiversity Net Gain Proposed Habitat Plan.

With regards to maintenance prescriptions, the prescriptions described in the LEMP are well detailed and only require minor alternations. Scrub management, although well detailed, it does not include replacing failed trees/specimen with the 30 years. Any specimen planted for scrub if failed should be replaced immediately. Whilst this practice is described in the hedgerow prescription it is missed within the scrub prescription and should be included.

The LEMP advises that scrub species producing berries should be cut outside the bird nesting season to ensure an adequate food source during autumn and early winter for overwintering birds. While this approach is supported, it would be beneficial to clarify that all hedgerows should also be cut outside the bird nesting season, ideally in late winter, as a precautionary measure to protect nesting birds.

The Ecological Appraisal supporting the outline permission states that where non-native species are proposed, they should be of value to wildlife, including species listed on the RHS *Plants for Pollinators* database. The proposed ornamental hedgerow should therefore comprise only pollinator-friendly species. While over half of the species meet this requirement, the following do not and should be replaced with species listed on recognised pollinator databases (including RHS *Plants for Pollinators*, *Plants of the World*, *Bee-friendly Plant List (ENG)*, and *Making Space for Nature – Pollinator Plants*): *Euonymus* ‘Green Spire’, *Griselinia littoralis*, and *Lonicera pileata* ‘Maigrun’.

Similarly, although some suitable pollinator-friendly shrubs are proposed, a number of ornamental species offer limited pollinator value. The introduced shrub list should therefore be revised to prioritise species from the above databases. The same applies to climbers, where only 13 of the 37 proposed species are pollinator-friendly; the remaining ornamental species should be reconsidered.

Overall, the planting schedule includes a disproportionate number of ornamental, non-pollinator-friendly species, which conflicts with the biodiversity objectives set out in the Ecological Appraisal. While several appropriate species are included, a greater emphasis on pollinator-friendly planting is required. The schedule should be revised accordingly to ensure compliance with the outline permission.

In summary, the LEMP provides detailed habitat management prescriptions and adopts appropriate precautionary measures for protected species. Only minor amendments are required to ensure alignment with the Statutory Biodiversity Metric user guidance and the approved outline permission.

Condition 28 Ecological permeability

To discharge this condition, an Ecological Permeability Scheme and Species-Specific Enhancement Plan were submitted by Pioneer Environment (Revision C, dated 6 October 2025). The permeability scheme is required to take account of, and build upon, the biodiversity enhancements proposed within the Ecological Appraisal submitted at outline stage.

The Ecological Appraisal identifies a range of biodiversity enhancements, including the provision of bat and bird boxes, invertebrate habitat piles, and bee bricks. The submitted Permeability Scheme provides a good range of biodiversity measures,

and the Species Enhancement Plan sets out the proposed quantities and indicative locations of these features. However, further detail is required to enable implementation on site. In particular, the plan should specify installation requirements such as exact locations, mounting heights, elevation, orientation, and any relevant restrictions, for example bat boxes to not be situated behind vegetation which blocks a clear flight path. While reference is made to general guidance, this does not constitute a clear, site-specific prescription of the measures to be implemented. Without this level of detail, the condition cannot be discharged.

Moreover, the inclusion of gully pot ladders is welcomed as a valuable biodiversity enhancement, particularly given the presence of a proposed priority pond intended to support a European Protected Species (great crested newt) and Biodiversity Action Plan priority species, including common frog and common toad. However, similar to bat and bird boxes, further information is required, including the precise locations of gully pot ladders, their specification, and the timing of installation. These details should be clearly set out within the Ecological Permeability Scheme.

With regards to hedgehogs, the provision of fencing gaps (13 cm × 13 cm), commonly referred to as 'hedgehog highways', is a positive measure to improve hedgehog and other wildlife permeability across the site. However, the proposed locations indicate that only part of the site would be accessible, as the southern and eastern boundaries currently lack any permeability enhancements. As a result, site-wide connectivity for wildlife is not fully achieved. Furthermore, the proposed habitats along the southern and eastern boundaries, including woodland, hedgerows, and neutral grassland, would provide optimal foraging opportunities for hedgehogs; it is therefore unusual that no permeability enhancements are proposed within these areas of optimal habitat. It is recommended that the Species Enhancement Plan be revised to include hedgehog highways along these boundaries to ensure permeability is delivered across the entire site.

Overall, the Ecological Permeability Scheme and Species Enhancement Plan require revision to provide greater site-specific detail for the proposed measures, including bat and bird boxes, gully pot ladders, and an increased provision of hedgehog highways. In addition, bee bricks—identified as a recommended enhancement within the Ecological Appraisal—have not been included within the current permeability plan and should therefore be incorporated into the scheme.

Condition 42 Bat Licence

Applicant has provided evidence in the form of a Natural England letter of securing a WML-CL21 Low Impact Bat License as such this condition can be discharged.

Conditions & Reasons (if required)			
N/A			
Date:	23/12/25	Signed:	L.Aparo