

Ecology Comments

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.

Figure 2 has been updated to include 10m buffer from the hedgerow and Section 4.3-4.4 has been updated to state that 10m will be maintained where possible.

Condition 27 LEMP

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.

Hedgerow 3 (H3) is mapped and included in the Statutory Biodiversity Metric (SBM) as a ‘Native hedgerow with trees’. It is stated within the Statutory Biodiversity Metric User Guide (DEFRA, 2024):

“Do not otherwise record individual trees if they occur within a habitat type characterised by the presence of trees, unless specified within the section on ‘recording individual trees at baseline’, which covers:

- trees within private gardens
- removal of trees within hedgerows
- removal of trees within rural lines of trees
- removal of trees within orchards and wood-pasture and parkland.”

The hedgerow has been mapped as a habitat characterised by the presence of trees, and since the oak tree is not proposed to be removed it does not need to be mapped or

included in the BNG as an individual tree. A note to example the mapping of the hedgerows with trees has been added to the bottom of Table 2. The canopy of the retained trees within the hedgerows from the 'Tree Protection' plan have been included in Figure 2.

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.

Areas of 'Private lawns' or associated vegetation in the Landscape Masterplan and the Landscape Plan, have been mapped as 'Vegetated gardens' and private patios have been reclassified as 'Unvegetated gardens'.

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.

Section 6.36 has been updated to include details on scrub replacement.

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.

Section 6.52 has been updated to include details on cutting hedgerows in winter.

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.

Listed species have been updated in line with changes to the ‘Landscape Plan’. Further clarification provided by ijLA.

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.

Section 4.16 has been updated to provide further information on creating hibernaculum. Section 4.23 has been updated to provide further information on installing bat boxes and Section 4.26 for bird boxes.

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.

Location of gully pot ladders have been added on Figure 3 and further information on installation is included in Section 4.14.

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.

The majority of the boundary fences will be post and rail or metal railing, therefore hedgerow highways will not be required. Figure 3 has been updated to include locations where close board fencing will be retained and/or created, in particular to the west of the building.