Parcel N
Arborfield Green
Wokingham

REPTILE MITIGATION STRATEGY

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QUALITY ASSURANCE

This report has been prepared in accordance with the Chartered Institute of Ecology and Environmental Management (CIEEM) Guidelines for Ecological Report Writing (2nd Edition, December 2017).

The facts stated in this report are true to the best of our knowledge and belief, and any opinions expressed are held genuinely and in accordance with the accepted standards of the profession. ACD Environmental Ltd is a CIEEM Registered Practice.

Client:	Crest Nicolson
Site/job:	Parcel N, Arborfield Green, Wokingham
Author:	Jake Cranston
Technical review:	John Constable

CONTENTS

1 EXECUTIVE SUMMARY

1.1. ACD Environmental Ltd have been commissioned to produce a Reptile Mitigation Strategy for Parcel N, Arborfield Green, Wokingham to address **Condition 21** the outline planning consent for the Reserved Matters Application (RMA) report at Arborfield. Parcel N is undergoing an RMA under the outline planning consent for Arborfield Green (O/2014/2280, Wokingham Borough Council).

1.2. Reptile surveys of the Application Site were carried out by multiple consultancies since 2008. Each of the surveys has been conducted in areas of the site identified as having the potential to support reptiles. **Table 1** below shows a summary of the surveys conducted before ACD Environmental Ltd update surveys commenced from the 23rd of April to 2nd of May.

Table 1. Previous reptile surveys.

Methodology / Type of Surveys	**Year**	**Month/NO. of Surveys visits**	**Company**
Population class assessment Griffiths, R. and Inns, H. (1998) and Froglife (1999)	2008	20 visits (April to September)	Entec
Population class assessment Griffiths, R. and Inns, H. (1998) and Froglife (1999)	2012	13 visits (September to October)	AMEC (now includes Entec)
Population class assessment Griffiths, R. and Inns, H. (1998) and Froglife (1999)	2014	7 visits (July to October)	AECOM
Update walkover survey to inform reserved matters	2023	AECOM Februrary and March	AECOM

1.3. The reptile surveys recorded a low population of grass snakes, slow worms and lizards across the wider area. The Approved Application Site was first surveyed in 2023 as part of an updated walkover and was the habitat was recorded as having potential to support reptiles. See **Table 2** for a break down of survey results within the surrounding areas.

Table 2. Results of previous reptile surveys.

Areas surveyed	Year	Results	Company
Areas across site	2008	Low populations of grass snake and slow worm across the site. Common lizard recorded in only one location (northeast).	Entec
Areas to the east of the development parcel and within the Northern SANG area	2012	Low populations of slow worm only.	AMEC
Areas to the south of the Rowcroft Barracks Site	2014	Evidence of a low population of grass snakes was found in the south eastern corner of Rowcroft Barracks.	AECOM

1.4. The updated survey by ACD Environmental Ltd was completed to identify current habitat suitability for reptiles. To determine this a reptile survey was completed to determine the current carrying capacity of the Approved Application Site based on recent survey effort. This would provide an informed approach before carrying out the recommended mitigation detailed in AECOM Reptile Mitigation Strategy. The results of the two checks on the 1st and 2nd of May was a single adult grass snake *Natrix helvetica* was discovered.

1.5. A full survey was not deemed necessary based on the results of the checks and the site being represented during previous surveys, taking into consideration marginal habitats and commuting pathways it is considered that a full translocation[1] is not necessary but movement of reptiles to a receptor site as part of a sensitive clearing methodology will be sufficient. See **Figure 1.**

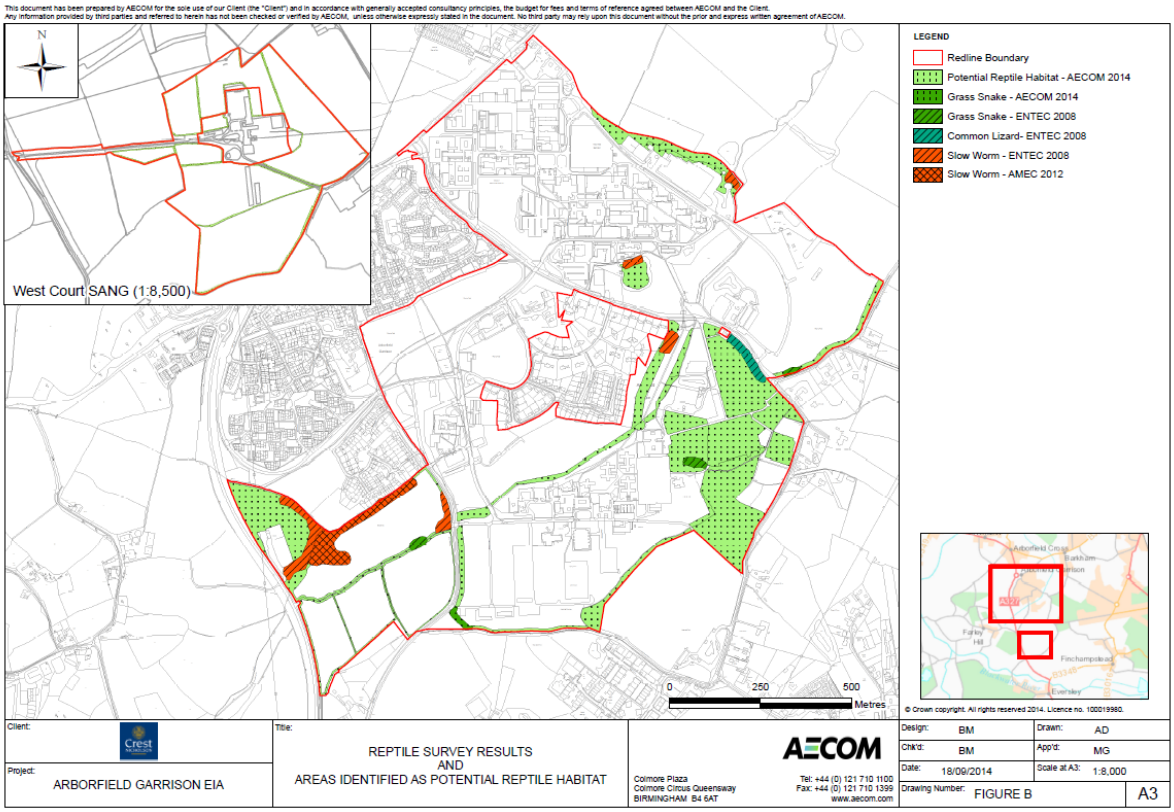


Figure 1: Reptile survey area and results.

1.6. This informed approach supports the sensitive clearing methodology detailed in a previous report[2] being appropriate given the results of recent reptile surveys and the current reptile population. It is likely that the Approved Application Site supports a small population of grass snakes.

1.7. In order to avoid any significant impacts on reptiles, a sensitive clearing methodology with a trapping and relocation programme will be carried out prior to any ground works or construction.

1.8. This document contains details of a methodology for the collection of reptiles and measures to prevent harm, and to prevent reptiles returning to the construction areas prior to and during development.

[1]Herpetofauna Groups of Britain and Ireland (HGBI). (2010). *Evaluating local mitigation/translocation: best practice and lawful standards*. Available at: Evaluating local mitigation/translocation: best practice and lawful standards - Amphibian and Reptile Groups of the UK.
[2]AECOM (2014) Arborfield Garrison – Reptile Mitigation Strategy. Environmental Statement Appendix 13.5

1.9. This document also contains ongoing management prescriptions for the receptor area, to ensure that the reptile habitat is protected and maintained in perpetuity.

1.10. Implementing all of the practices, techniques, and prescriptions in this document will help to ensure that there will be no significant impacts upon the population of reptiles and the development will be in conformity with relevant legislation and planning policy.

2 INTRODUCTION

2.1. ACD Environmental Ltd was instructed by Crest Nicolson in Feburary 2025 to produce a Reptile Mitigation Strategy for Parcel N, Arborfield, Wokingham. This land is hereafter referred to as the 'Approved Application Site'.

2.2. Outline permission for: Demolition of buildings and phased redevelopment of Arborfield Garrison and adjoining land for: Up to 2,000 new dwellings (including up to 80 units of extra care housing). District centre comprising a food store up to 4,000 sq m gross with up to a further 3,500 sq m (gross) floor space within Classes A1, A2, A3, A4, A5, B1, D1 and D2 (with residential above - Class C3), and transport interchange, village square, car parking, servicing and drop off area. Up to a further 1,500sq m (gross) floor space within Classes D1 and D2. Neighbourhood centre to provide up to 300 sq m (gross) floor space within Classes A1, A2, A3, A4, A5, B1, D1 and D2, with parking/servicing area. Secondary school for up to 1,500 pupils (Class D1) including sports pitches, floodlit all-weather pitch, and indoor swimming pool and parking areas. Up to three-form primary school (Class D1) with sports pitch and parking areas. Associated phased provision of: car parking; public open space including sports pitches, informal/incidental open space, children's play areas including multi-use games area (MUGA), skate park, community gardens/allotments; landscaping/buffer areas; boundary treatments; new roads, footpaths, cycleways and bridleways; sustainable urban drainage systems, including flood alleviation works.

2.3. This report has been produced to address **Condition 21** of the planning permission. **Condition 21** states:

2.4. "The reserved matters for any phase of the development shall include a detailed reptile mitigation strategy. Each detailed reptile mitigation strategy shall be in accordance with the reptile mitigation and contingency measures contained within the submitted Arborfield Garrison – Reptile Mitigation Strategy (AECOM Environment, October 2014). The mitigation strategy shall be implemented in accordance with the approved plan unless otherwise approved in writing by the local planning authority."

2.5. Reason: To ensure appropriate mitigation for the biodiversity impact of the development in accordance with Wokingham Borough Core Strategy Policy CP7.

Competence

2.6. This report has been written by Jake Cranston, Assistant Ecologist at ACD Environmental Ltd and Qualifying member of the Chartered Institute of Ecology and Environmental Management (CIEEM). Jake has undertaken various surveys, ranging from Habitat Surveys to Phase 2 surveys for protected species, including bats, badgers and dormice. Jake has written various reports, including Badger Technical Notes, and Landscape and Ecological Management Plans.

2.7. A Technical Review of this report has been undertaken in line with ACD Environmental Ltd's Quality Assurance procedures. The Technical Review was carried out by John Constable, ACD Environmental Ltd.

3 METHODOLOGY

3.1. The Approved Application Site comprises approximately 2.4 hectares of land. The Ordnance Survey Grid Reference for the approximate centre of the site is: SU 77046 65391.

3.2. The Approved Application Site is situated in a suburban location surrounded by semi-improved grassland on all aspects but the north where a line of trees is located. The Approved Application Site is 3.04 m to Wokingham train station **Image 1**.

Image 1: Approximate boundary of the Approved Application Site. Source: QGIS 2025.

Reptile Surveys

3.3. A total of two reptile checks were undertaken by ACD Environmental Ltd between April and May 2025 to update and identify the presence or absence of common reptiles. Previous surveys suggested that the Approved Application Site only supports a small number of reptiles, and this was confirmed by only a single grass snake being discovered, despite ideal habitat being present. Full details can be found in **Table 3.**

Suitable Reptile Habitat

3.4. The Approved Application Site mainly consist of poor semi-improved grassland and scattered scrub that is present to the north alongside with a line of trees. To the south are Suitable Alternative Natural Greenspace (SANGS) that are suitable habitat for grass snakes and reptile species found within this geographical region, common lizard *Zootoca vivipara*, slowworm *Anguis fragilis* and grass snake. The large communities of field vole located on site also provides plenty of holes and tunnels, that reptiles can use to shelter from predation and adverse weather.

4 RESULTS AND EVALUATION

Reptile Surveys

4.1. The surveys carried out between 2008 and 2014 strongly suggest the following about the distribution of reptiles within Arborfield site: common lizard, slow worm and grass snake are present within the surrounding area and only grass snakes are located within the Approved Application Site.

4.2. The distribution of grass snakes is patchy, with a small, isolated area being found to support them within the Approved Application Site, however habitat for reptiles and corridors through which these animals can commute occur across and into the Approved Application Site and surroundings. These populations of all present reptile species is low where these species occur. The updated survey suggests a small number of grass snakes are likely to be using the Approved Application Site as no other reptiles were recorded during the updated surveys conducted by ACD Environmental Ltd in 2025.

Suitable Reptile Habitat

4.3. Areas of semi-improved grassland and scrub located within the Approved Application Site are considered suitable for reptiles. The retained habitat within the Approved Application Site towards the south and east of the Approved Application Site boundaries will be retained and enhanced for the benefit of reptiles and other wildlife. The SANGS located south of the Approved Application Site has also been built to support reptiles and will be maintained and managed to support wildlife, including reptiles.

4.4. These retained areas are comprised of semi-improved grassland and tall ruderal and were identified as suitable reptile habitat during the extended Phase 1 Survey in September 2014 by AECOM[3].

4.5. As such, and with reference to best practice guidelines[4]. and the AECOM Reptile Mitigation Strategy, it is considered that an off-site receptor area is appropriate for the translocation of the reptile population within the Approved Application Site.

4.6. The receptor area is situated to south and east of the development zone within the red line boundary (see **Appendix 2**) and will therefore attain sun exposure for basking reptiles.

4.7. The local reptile population will be maintained without severance to the population. Temporary

[3]AECOM (2014) Arborfield Garrison – EIA. Environmental Statement Appendix 13.5
[4]Gent, A. and Gibson, S. (1998). *Herpetofauna Workers' Manual*. Peterborough, UK. Joint Nature Conservation Committee. http://jncc.defra.gov.uk/page-3325

severance will occur, however, with use of a reptile exclusion zone which will protect translocated reptiles for the duration of the construction works.

4.8. The population of grass snakes identified is generally considered low (population of less than 50 per hectare) and grass snakes are able to live at high densities. Therefore, the on-site receptor area is considered a sufficient size to support the low population of reptiles identified in previous surveys, particularly with their connectivity to other on-site and off-site areas.

5 MITIGATION STRATEGY

Pre-translocation

5.1. The grassland within the SANG receptor areas will not be cut prior to the translocation.

5.2. Since the habitat is already considered suitable for reptiles, no other enhancements are considered necessary prior to the translocation.

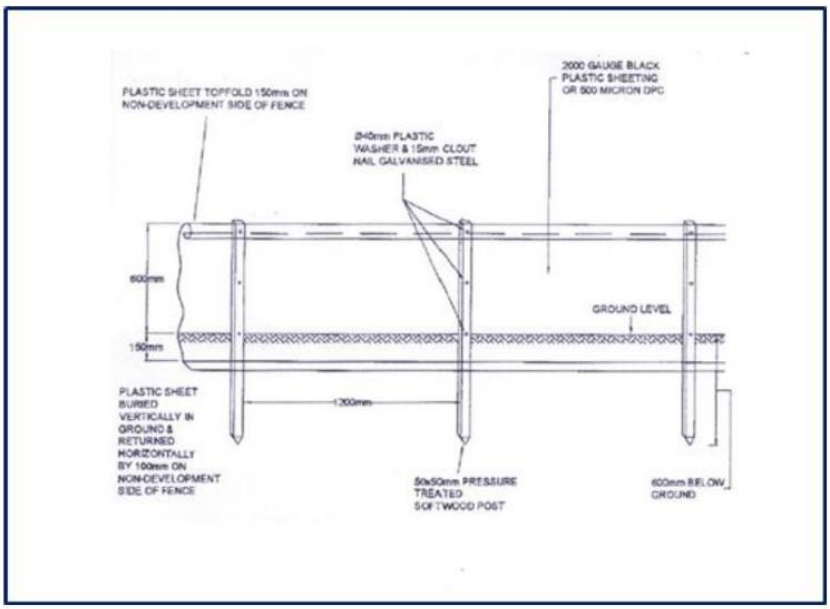
Translocation Exercise

5.3. A reptile exclusion zone using semi-permanent HDPE reptile fencing will be installed along the boundary of the Approved Application Site in accordance with the Reptile Mitigation Plan in **Appendix 1** to prevent harm during the construction phase.

5.4. Semi-permanent HDPE reptile fencing will also be installed around the Approved Application Site boundaries and on the outside of the Heras fencing to prevent reptile re-access to the Approved Application Site during construction works.

5.5. The exclusion zone must be protected throughout the duration of the construction phase. Heras fencing will be installed on the development side of the exclusion zone to prevent encroachment and disturbance by persons or machinery.

5.6. The reptile fencing will be set out according to the diagram below, being approximately 600m above ground and 150mm below ground, with a 150mm topfold on the receptor area side of the fence. 2000-gauge plastic is recommended.



Reptile Fencing detail (taken from http://www.reptilefencingco.co.uk/services)

5.7. The reptile fencing must remain in place for the duration of construction and must not be removed until all construction works have been completed. This will protect reptiles from harm and once removed will allow them to re-colonise suitable areas within the Approved Application Site.

5.8. Reptile trapping will involve the installation of reptile exclusion fencing and placing of reptile 'refugia'. Refugia are best placed at high densities (to maximise capture rate), positioned in locations which will be attractive to reptiles (e.g. sun-traps).

5.9. A minimum of 20 days will be required to remove the reptiles from the Approved Application Site as low to moderate numbers of grass snakes are likely to be present. In order to find reptiles while they are basking, it is generally best to search when the air temperatures are between 9 - 18˚C. On cooler days, bright sunshine is a good sign, while hazy or intermittent sun gives the best results at the warmer end of the scale. Rainy or windy conditions are usually unsuitable. The sequence of weather conditions is significant. Reptiles can be captured in their active season between April and September/early October, but the most profitable season is Spring, particularly April. Summer can produce intermittent trapping results because it can become too hot to trap, and reptiles may be reluctant to emerge above ground during such conditions. September is also a good month, but more neonates (new-borns) are likely to be present, which can prolong trapping.

5.10. Reptile trapping will be carried out by experienced ecologists and reptiles will be transported in safe accommodation (terrariums or buckets lined with vegetation/ substrate) to the receptor site, and released in suitable weather, as soon as possible following capture.

5.11. Habitat manipulation will be carried out during the latter stages of the trapping period to increase the rate of captures. This will involve reducing the amount of suitable vegetation cover, thus rendering the reptiles easier to catch, by strimming and brush-cutting pockets of brambles and rough grass. 'Islands' of rank vegetation can be left, and it is around here that the remaining reptiles will be concentrated.

5.12. Once five clear days of zero captures have been achieved in suitable weather conditions, trapping will cease, and destructive searching will take place.

5.13. A destructive search will begin with the careful removal of any features which may provide refuge for reptiles, such as brash piles. Such features will be teased apart by hand or by appropriate machinery and thoroughly searched to ensure no reptiles are present. Vegetation will be thoroughly searched by a suitable qualified ecologist for the presence of reptiles prior to removal, following which systematic stripping will take place with the use of an excavator with a toothed bucket. Firstly, the top few centimetres of the ground will be removed, to expose reptiles sheltering in crevices just below the surface.

5.14. Ecologists would be positioned to catch reptiles as they are disturbed. Following this, larger and deeper excavations will be made, concentrating on areas which afford shelter to reptiles, such as tree stumps, debris and grass tussocks. Particular care will be taken when emptying the bucket in case any reptiles are dug up with the soil.

5.15. Given that some reptile species spend a great deal of time underground, habitat manipulation can be less effective at sites containing buried material and other debris, therefore it is likely that reptiles (particularly slow worms which are largely subterranean) will also be found during the destructive search. Even when carried out using experienced contractors and ecologists, destructive searches may kill or injure a small percentage of animals (perhaps 0-5%) and the lawfulness of this method requires careful interpretation. Hence why the destructive search is typically carried out after other methods (i.e. trapping) have been used.

5.16. The reptile fencing will be checked on a weekly basis following the translocation and during the course of the development by the Site Manager. If any damage occurs, the fencing must be repaired immediately.

Hedgerow removal

5.17. The hedgerow running along the southern boundary requires fragmented removal in line with the scheme access amendments, where access will now be granted from the south side of the Approved Application Site. See **Figure 2.**

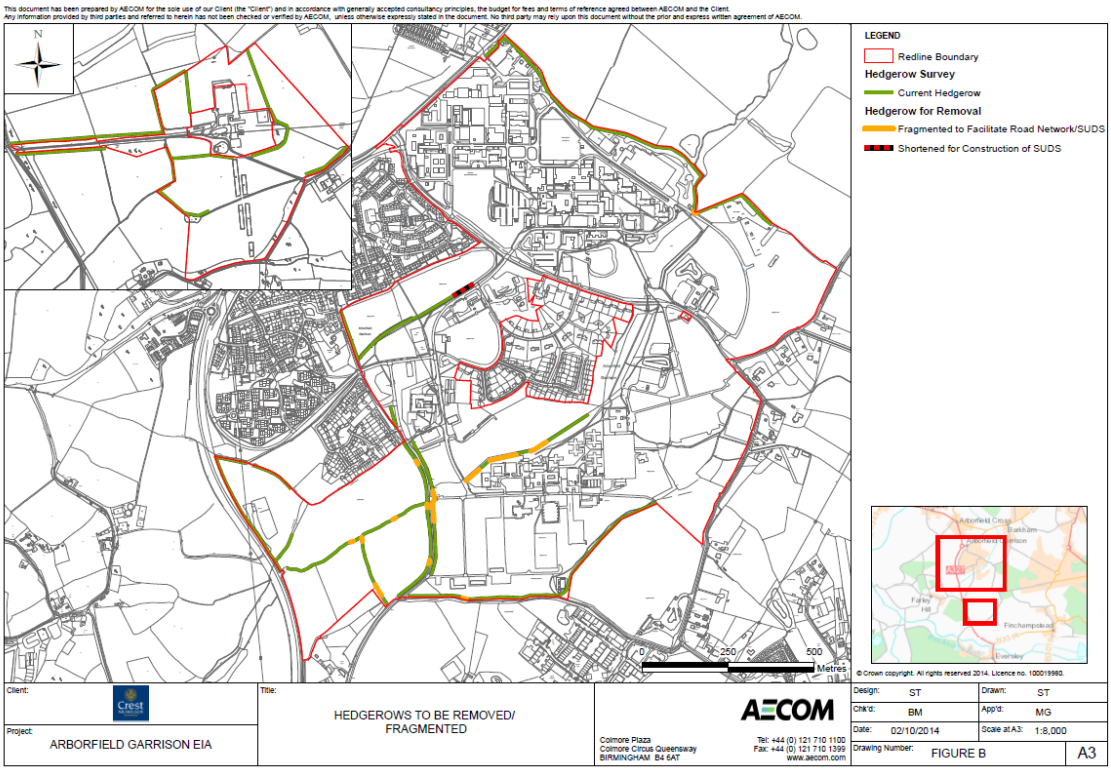


Figure 2: Hedgerows to be removed

5.18. The length of hedgerow to be removed is adjacent to suitable reptile habitat and may also provide corridors for movement of reptiles. Therefore, it is possible that reptiles will be seeking shelter and/or commuting within the vicinity of the hedgerow.

5.19. The trapping and translocation exercise provided above should mean that reptiles in the area are successfully translocated, and minimal individuals will be present during the vegetation removal.

5.20. However, do to the proximity to the sustainable urban drainage system (SUDS) feature and increase likelihood that grass snakes may be present, the continued removal of the hedgerow must be carried out using precautionary working methods and under supervision by a suitably qualified Ecological Clerk of Works (ECoW).

5.21. The following precautionary working methods should be followed to protect reptiles during the hedgerow removal:

- Prior to vegetation removal, the base of the affected hedgerow will be hand searched by an appropriately qualified ecologist. Any reptiles recorded during the hand search will be moved to the receptor area as shown in **Appendix 1**.

- Following the hand search, the ECoW will supervise directional strimming of the ground level vegetation in two cuts, the initial cut to 200mm and the second to 50mm taking place 1-2 hours after the initial cut. All arisings will be removed from the area to prevent potential areas of refugia from being used by potential reptiles moving from or through the area.

- Any potential hibernacula such as tree roots and wood piles shall be removed carefully by hand by the ecologist. Any individuals found will be translocated to the receptor area as above.

- Following the above precautionary measures, the hedgerow removal can proceed. The removal will remain under supervision of the ecologist who will monitor for any further reptiles and translocate as above if required.

- The hedgerow removal may only take place during the reptile active season which runs between April and September/early October, on dry days and when temperatures are between 9 - 18˚C.

6 ENHANCEMENT AND MANAGEMENT

6.1. The receptor area will be managed to provide habitats such as long grassland and scrub for the provision of optimal foraging and hibernating habitat for reptiles[5]. Long-term management of the receptor site will be secured via an appropriate agreement to ensure it is managed correctly and the reptiles are safeguarded from inappropriate management.

Hibernacula

6.2. Prior to the first season of hibernation following the completion of construction works, a hibernaculum will be created, comprising a 2-metre long, 2-metre wide bank, created by excavating the earth to 0.5m deep, lined with sand or gravel, and backfilled with clean, inert bricks, rubble, logs and topsoil, creating lots of small gaps where reptiles can hibernate whilst building up the bank to 2 metres, then capping with turf and stones/rocks. Small gaps must be left for reptiles to enter and exit the finished hibernaculum.

6.3. The habitats surrounding the hibernacula should be managed in winter to avoid disturbing reptiles which may be using the area. The vegetation within the immediate vicinity should be cut back to avoid the hibernacula becoming densely shaded. Mowing should be carried out between November and December, taking care not to create large areas of short grassland within the immediate vicinity of the hibernacula.

Log/brash piles

6.4. Log/brash piles will also be created using timber from felled hedgerows and branches from coppiced and pollarded trees to provide sheltering areas.

6.5. Piles should not be tightly compacted, therefore it is recommended that the central core be compacted, while the outer layers are laid more loosely on top, using materials of various sizes, as to provide a more diverse structure. The materials should vary in size

6.6. Piles should be situated in a sunny location within areas of long grass or scattered scrub, so that there is cover immediately surrounding, or adjacent to, the pile. Setting the piles within vegetation will also assist increase their inconspicuousness, thereby reducing the risk of public disturbance. However, due to the high levels of public access on-site, the materials can be either partially buried in the ground or anchored with wire or secured with wire stapled to the larger logs.

Habitat Management

[5]Gent, Edgar, P., Foster, J., and Baker, J (2010). *Reptile Habitat Management Handbook.* Bournemouth. Amphibian and Reptile Conservation (ARC).

6.7. The retained grassland in the southern and eastern areas of the Approved Application Site is to be seeded with Emorsgate EG1 general purpose meadow grass mixture with patches of Emorsgate EG10 tussock grass mixture interspersed, both of which require little maintenance and will enhance the grassland to create a diverse mosaic of low growing grasses that produce a short, open sward (EG1) with patches of long, tussocky swards (EG10). It is recommended that seeds are spread throughout, especially into any gaps in vegetation.

6.8. Following the initial grace period, to maintain a diverse tussocky structure and prevent succession to scrub, the grassland will be cut on a rotation of no less than three years (i.e. one third of the grassland is cut each year).

6.9. To allow access for the public, for example along the Public Right of Way which runs through the retained grassland, a limited quantity of 1m wide paths can be cut through the grassland area as required.

6.10. Patches of native scrub will be cut to form ‘scallops’ along the south facing edges to increase the number of sheltered basking spots.

6.11. Emorsgate EP1F wildflowers for pond edges will be sown throughout the attenuation basin in the southern area of the Approved Application Site to provide wet wildflower grassland habitat. Annual weed growth may be cut back to encourage the development of good perennial ground cover. Following this, a varied structure can be achieved by cutting back and removing short sections of vegetation every 2-3 years in rotation, whereby vegetation will be removed as a wedge, like removing a slice of cake.

6.12. Dense stands of single and dominant species, such as yellow iris *Iris pseudacorus* may benefit from selective thinning.

6.13. Any vegetation cutting or removal should be carried out between September-October, on dry days when temperatures are above 10°C, when reptiles are active and can move out of harm’s way.

6.14. Cutting will be undertaken by either a tractor-mounted mower, set to a minimum of 150mm above ground level, or by strimming/brush-cutting.

6.15. Within the reptile hibernaculum area, only strimming will be used. Pockets of grassland will be strimmed to maintain a good mosaic of basking habitat and cover.

7 POST TRANSLOCATION MONITORING

7.1. The reptile population will be monitored by carrying out a total of three surveys in early spring, spread across three years in years two, four, and six post-translocation.

7.2. Detailed methods for reptile monitoring surveys will be in accordance with the relevant published guidelines.

7.3. Following each survey, a short report will be produced to relate to management objectives, to monitor the condition of the habitats, and whether management prescriptions need to be adjusted to reach the desired outcomes (i.e., uneven-aged swards of tussocky grassland). A copy of the monitoring report will be sent to the Local Planning Authority and Local Wildlife Trust.

7.4. The receptor area will be managed in perpetuity for the conservation of reptiles, by way of a suitable legal agreement.

8 CONCLUSIONS

8.1. This Reptile Mitigation Strategy has been produced to fulfil **Condition 21** of the planning consent for the Approved Application Site for Arborfield Green (O/2014/2280, Wokingham Borough Council).

8.2. Reptiles will be protected for the duration of construction with use of an exclusion zone protected by reptile fencing and Heras fencing (or similar) along the southern and eastern boundary. Reptiles will also be prevented from re-accessing the construction zone with installation of reptile fencing around the development boundaries.

8.3. The southern and eastern areas of the Approved Application Site are designated as future open space and are suitable for use as a reptile receptor area, following construction works and enhancements.

8.4. The receptor area is considered to be suitable to accommodate the donor population of reptiles, and will be subject to enhancements and sympathetic, targeted long term management in accordance with this Reptile Mitigation Strategy.

8.5. With implementation of the measures outlined within this report, it is considered that there will be no significant impacts upon reptile populations, and the Approved Application Site will be in conformity with relevant legislation and policy.

9 REFERENCES

1	*Herpetofauna Groups of Britain and Ireland (HGBI). (2010). Evaluating local mitigation/translocation: best practice and lawful standards. Available at: Evaluating local mitigation/translocation: best practice and lawful standards - Amphibian and Reptile Groups of the UK.*
2	*AECOM (2014) Arborfield Garrison – Reptile Mitigation Strategy. Environmental Statement Appendix 13.5*
3	*AECOM (2014) Arborfield Garrison – EIA. Environmental Statement Appendix 13.5*
4	*Gent, A. and Gibson, S. (1998). Herpetofauna Workers' Manual. Peterborough, UK. Joint Nature Conservation Committee. http://jncc.defra.gov.uk/page-3325*
5	*Edgar, P., Foster, J., and Baker, J (2010). Reptile Habitat Management Handbook. Bournemouth. Amphibian and Reptile Conservation (ARC).*

APPENDIX 1: REPTILE MITIGATION PLAN

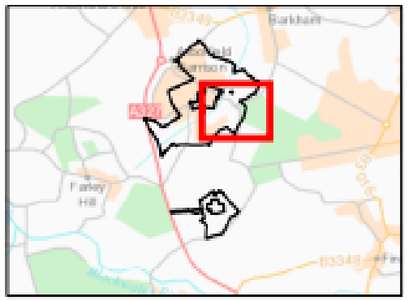
APPENDIX 2: REPTILE RECEPTOR AREA AND ENHANCEMENTS (POST-DEVELOPMENT)

LEGEND

- SANG Boundary
- Bat Barn Location
- Brash Pile/ Egg Laying Site
- Hibernacula
- Log Pile
- South Facing Mound

Phase 1 Habitat

- Broadleaved Semi-natural Woodland (not reptile habitat)
- Broadleaved Plantation Woodland (not reptile habitat)
- Scrub
- Semi-improved Neutral Grassland
- Standing Water - Pond (not reptile habitat)



The area of additional broadleaved plantation woodland and dense scrub cover within the SANG is indicative and actual areas and volumes will depend on "on the ground" conditions and liaison with relevant stakeholders, while maximising the multifunctional benefits to biodiversity and recreational value. There will be no net loss of woodland.

Individual Trees to be retained are presented within the Tree Report and associated figures (ES Appendix 13.7), trees to be planted are indicated within the Green Infrastructure Strategy.

Detail on the Hedgerows to be retained are presented within the Hedgerow Survey Report and Strategy and associated figures (ES Appendix 13.6).

Client: Crest	Title: HABITAT CREATION - NORTHERN SANG	AECOM	Design: BM / Drawn: ST
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APPENDIX 3: SOFT LANDSCAPE PLANS

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