

MEMORANDUM

From:	Duncan Fisher Ecology Officer		
Service	WBC Ecology	App No:	252792
Address:	Land South Of Swallowfield Road, Arborfield.		
Proposal:	Application for submission of details to comply with the following condition of planning consent 241425 dated 31.10.2025. Condition 4 relates to Habitat Management and Monitoring Plan (HMMP).		
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

Condition 4 – HMMP

The decision notice for application 241425 sets condition 4 as:

4. Habitat Management and Monitoring Plan (HMMP) - Prior to the commencement of the development hereby permitted, a habitat management and monitoring plan (HMMP) shall be submitted to, and be approved in writing by, the local planning authority. The content of the HMMP shall include the following:

- a) Description and evaluation of features to be managed.
- b) Ecological trends and constraints on site that might influence management.
- c) Aims and objectives of management.
- d) Appropriate management options for achieving aims and objectives.
- e) Prescriptions for management actions.
- f) Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- g) Details of the body or organization responsible for implementation of the plan.
- h) Ongoing monitoring and remedial measures.

The HMMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The

plan shall also set out (where the results from monitoring show that conservation aims and objectives of the HMMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: To protect biodiversity and ensure a biodiversity net gain following the development. Relevant policy: NPPF Section 15 (Conserving and Enhancing the Natural Environment), Local Plan policies CP3 CP7 and TB23.

The reason setting out that this HMMP is to capture the management required to help meet the statutory biodiversity net gain on-site, as previously indicated as the strategy for this development proposal.

The applicant as submitted a letter report HMMP (Bombus Ecology, 10 November 2025). Unfortunately, the letter report does not cover explicitly points c) nor d) of the condition. This means that it does not identify the need to meet a certain habitat type and condition to achieve a minimum of 10% habitat biodiversity net gain. There is no identification of key condition criteria for the habitats proposed to be managed in respect to biodiversity net gain. For instance, to achieve moderate condition for modified grassland habitat types, there needs to be an average of 6-8 species per m².

Further, the HMMP does not recognise that on-site habitat creation will need to maintain habitats for a period of 30 years if the on-site aims and objectives are to deliver the biodiversity net gain objective.

It may be that the applicant now expects to satisfy the statutory biodiversity net gain requirement through a mix of on-site and off-site delivery and the, yet to be submitted, detailed biodiversity gain plan will propose lower distinctiveness on-site habitat types and condition scores that the letter report HMMP would be appropriate to deliver. However, I am concerned that, as currently written, it does not provide the detail necessary to achieve the on-site habitat types and condition scores indicated at the point of determination.

Please could the applicant provide further information as to which approach they are expecting to take. It may be that they wish to amend the HMMP to address how on-site biodiversity net gain delivery will be addressed.

If the HMMP is to be amended in this respect, it would be beneficial if it could also contain more detail on points e), f), and h) of the condition so it is clearer what will happen and not just what could happen. It would also be beneficial to include an annotated layout within the management plan so it is clear where the textual location references are within the site.

I note that the HMMP sets out a species mix for native hedgerow on site that is different to the species mix set out for new hedgerow in approved drawing number 1009_02-11 Rev.C. Please can the HMMP be updated to ensure that there is not a conflict between these species mixes. It is relevant to work with the species list in

the approved plan, if the applicant is seeking to achieve a species rich native hedgerow as indicated in the biodiversity net gain strategy submitted for application 241425.

I recommend that the local planning authority confirm the approach that the applicant is expecting to take for biodiversity net gain. This will help avoid the risk that an HMMP is approved that falls short at achieving the biodiversity net gain objective. I also recommend that the local planning authority seek amendments to the HMMP to give it a structure that better satisfies the elements required by condition 4.

Conditions & Reasons (if required)			
n/a			
Date:	19 January 2026	Signed:	D. Fisher