

MEMORANDUM

From:	Duncan Fisher Ecology Officer		
Service	WBC Ecology	App No:	250919
Address:	Stowdes Estate, Culham Lane, Remenham, RG10 8NU.		
Proposal:	Application for submission of details to comply with the following condition of planning consent 213610 dated 15/09/2023. Condition 3. Archaeology. 4. Construction Environmental Management Plan. 6. CEMP (Biodiversity). 7. Protection of Trees. 9. Site Lines.		
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 3. Archaeology

No comment

Condition 4. Construction Environmental Management Plan

No objection

Condition 6. CEMP (Biodiversity)

This response is based on a review of the submitted Construction Environmental Management Plan (Biodiversity) revision P02, March 2025.

I do not recommend discharge of this condition.

On the whole, the CEMP proposes suitable mitigation measures for the protected species risks on-site. However, I am concerned that the following elements are missing for it to integrate fully with the Construction Method Statement, address all the risks, and provide the full detail of the mitigation measures to be implemented.

- a) The CEMP needs to reference the Construction Method Statement as a complementary document to be read in conjunction with the CEMP.
- b) The CEMP needs to cross-reference with the incident reporting procedure of the Construction Method Statement.

- c) The CEMP should have a review process similar to that set out in 4.2 of the Construction Method Statement with the local planning authority being a relevant party for circulation.
- d) The CEMP does not pick up there is vehicle tracking across a wider site in order to access the main house construction zone. This is covered in the Construction Method Statement. The CEMP needs to reflect on any measures (e.g. vegetation management) that are required on the access route as a mitigation measure.
- e) The badger mitigation strategy is heavily reliant on a repeat badger field signs survey and a pre-commencement check of the construction area. These surveys may result in modification of the plan (e.g. through recognising the need for new construction fencing to protect new setts). I therefore recommend that there be an additional line to recognise that this is a review point (as per point c, above) with the potential to inform the local planning authority of a change to CEMP detail (or provide further clarification through addendum on this matter).
- f) The bat mitigation strategy is reliant on the recognised bat roost being registered under the Bat Mitigation Class Licence (BMCL) and this is reliant on the results of 2025 bat surveys. As the licence requirement and mitigation method may need to change, subject to the results of the surveys, I recommend that there be an additional line to recognise a review point (as per point c, above) with the potential to inform the local planning authority and of a need to change CEMP detail (or provide further clarification through addendum on this matter).

Points a-f above are made in a constructive way to achieve a CEMP (Biodiversity) that can act as a living reference document. If these relatively minor changes can be made, I would be able to recommend discharge of condition 7.

Condition 7. Protection of Trees

No objection

Condition 9. Site Lines

No objection

Conditions & Reasons (if required)

n/a

Date:	13 October 2025	Signed:	D. Fisher
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