

MEMORANDUM

From:	Duncan Fisher Ecology Officer		
Service	WBC Ecology	App No:	242665
Address:	Land west of Kingfisher Grove, Three Mile Cross.		
Proposal:	Application for approval of Reserved Matters pursuant to Outline Planning Consent 201002 (approved under appeal ref. APP/X0360/W/22/3304042 dated 31/01/2023) for the erection of 49 no. affordable dwellings with associated drainage and attenuation, open space and landscaping. Details of appearance, landscaping, layout and scale to be considered, plus details for discharge of conditions 11, 12, 13, 15 and 16 from the Outline permission.		
Type of Development:	Major Dwellings (10+)		
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

Reserved Matters

I have the following concerns regarding the layout, landscaping, and boundary treatments:

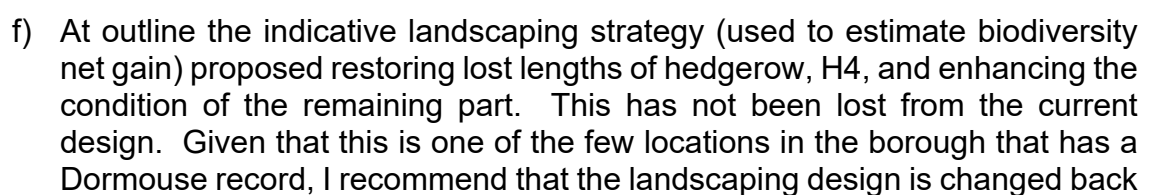
- a) The boundary treatment behind plots 1 to 8 is proposed as close board fence. The gap between these gardens and the edge of the site is proposed to be mixed scrub habitat that will need to be maintained in order to achieve biodiversity net gain. I am concerned that the type of boundary treatment proposed is prone to being moved and there may be garden encroachment and loss of this important corridor. I recommend that the boundary treatment should be changed to brick wall to mitigate this risk.



- b) The Levels Strategy and Cross-section B indicates that there will be step level changes between plots – e.g. 1.35m between plots 14 and 15 – it is not clear whether there will be retaining walls used at boundary fences between plots. This needs to be clarified so the development can show how it provides ecological permeability between rear gardens and between the gardens and public open spaces.
- c) Regarding ecological permeability, the plans need to show where the Hedgehog Highway holes (as per MM10 of the Updated Ecological Appraisal) will be installed within boundary treatments.
- d) Within the soft landscaping plans, it would be preferable to remove the six trees proposed for the southern and western edges of the wildlife pond in order to prevent the pond being too shady.



- e) It is not appropriate to plant new trees so close to retained powerlines (it appears that no easement has been accounted for). They will not be sustainable in these locations in the medium to long-term. These trees should be moved to locations where they will have sufficient growing space without interference with the powerlines.



to restore the length of the hedgerow and provide connectivity for this species.

It may be that the detail to resolve these points can be resolved during discharge of condition 7, which I understand will be subject to a separate application. However, it is preferable to ensure that there isn't a confusing picture of contradicting approved plans.

Condition 11 – Surface Water Drainage

From an ecological perspective, I can recommend that this condition can be discharged.

Condition 12 – Archaeology

No comment

Condition 13 – Arboricultural Method Statement

I do not recommend that this condition is discharged.

The submitted Arboricultural Method Statement (ACD Environmental, ref: PRI24594aia-ams, July 2024) does not include any information to satisfy part (e) of the condition. This must be provided. I would expect the Veteran Tree Management Plan to include a review of the proposed landscaping works within the veteran tree buffer zones and provide guidance for acceptable implementation and ongoing management of this buffer zone. At the moment I am concerned that the detailed landscaping and Landscape Environment Management Plan may conflict with veteran tree management measures that have not been included in the current document submitted.

The Arboricultural Method Statement does not cross-reference or incorporate any of the ecological mitigation measures recommended in the Updated Ecological Appraisal – measures MM6, MM7, MM10 and MM11 having relevance to arboricultural works. Although currently identified as being retained, I also recommend that the Arboricultural Method Statement incorporates the Updated Ecological Appraisal information on trees with bat roost potential to ensure that arbor workers are briefed on the risk to this protected species group.

I recommend that the local planning authority seek a revised submission to resolve this missing detail.

Condition 15 – Biodiversity Net Gain

I do not recommend that this condition is discharged.

The submitted Updated Biodiversity Net Gain Assessment to reflect Reserved Matters Proposals (Aspect Ecology, ref: 1005796-04, October 2024) does not have the accompanying completed Biodiversity Metric 3.1 spreadsheet. Please can this be submitted. The appended screenshots of relevant extracts within the assessment report do not include the River Units tabs despite the Headline Results tab indicating that there are baseline units for this category.

The assessment does not demonstrate a 10% biodiversity net gain in the River Units category – unlike the October 2022 assessment submitted at appeal. The new assessment needs to explain and justify why this is acceptable.

Regarding the number of individual trees that are proposed within the development, whilst it is good to see the ambition to plant the number used within the metric, I am not convinced that all of these will be retained for the full 30 year period that a biodiversity net gain assessment requires. There are closely packed groups of trees in some areas which will likely need to be thinned over this time period. In fact, section 6.2 (Native Trees and Shrubs) of the submitted LEMP refers to thinning of the trees. It would be appropriate to discount the number of trees counted within the metric to allow for this thinning.

I recommend that the local planning authority seek further information to explain this omission. It may also be relevant to alter some lines within the metric, taking on board the layout / landscaping concerns raised above.

Condition 16 – Landscape Environmental Management Plan

I do not recommend that this condition is discharged.

I have reviewed the Landscape Environmental Management Plan (Aspect Ecology, ref: 105796-04 576-04 LEMP v4 AN/LP/CL, October 2024) and have the following concerns:

- 1) Section 4.2 (overarching objectives) should include reference to protected species covered in 3.2 and enhancement of conservation status of these species as an objective.
- 2) Section 4.2 (overarching objectives) needs to include an objective in relation to long-term management of irreplaceable habitat (veteran trees) – with further information on veteran trees management in sections 4.3, 5, 6 and appendices 5796/2 and 5796/3.
- 3) Section 4 (Aims and Objectives of Management) does not identify the multifunctional nature of the open spaces. It needs to set objectives in terms of public access, play areas, connections to adjacent sites, and drainage management.
- 4) Section 5 (Appropriate Management Options for Achieving Aims and Objectives) appears incomplete. It is just a list of habitats and faunal enhancements and not the summarised management actions that paragraph 5.1.1 identifies will be within this section.
- 5) Section 5 (Appropriate Management Options for Achieving Aims and Objectives) needs to make the association between the features listed and how they are defined in the soft landscaping plans. There is a slight difference between labelling and this needs to be clarified.
- 6) Section 6 (Prescriptions for Management Actions) needs to have its sub-sections renumbered to avoid duplicate numbering.
- 7) Section 6.2 (Retained Trees and Hedgerows) provides two prescriptions (one for recently managed hedgerows, one for hedgerows not subject to recent management. At this stage, the LEMP should be identifying which hedgerows on site fall into which category, preferably with the use of a plan.
- 8) Section 6.3 (Retained and Enhanced Wildflower Grassland) does not follow the same prescription as given in the soft landscaping plans – which makes

a distinction between enhanced grassland and created grassland – Please can this be updated to account for the approach specified in the soft landscaping plans for newly created grasslands.

- 9) Section 6.3 (Retained and Enhanced Wildflower Grassland) specifies the use non-selective herbicide as part of the preparation for seeding. I am concerned that this is not appropriate in the proximity of the veteran trees. I recommend that this section needs to be specific about actions in the buffer zones of the veteran trees and how the risk of harm to this irreplaceable habitat is avoided.
- 10) Section 6.2 (Native Trees and Shrubs) refers to rotational coppicing of trees and shrubs. This is appropriate in limited locations only, with reference to the criteria given in Table 4.2 within the LEMP. I recommend that this needs to be better clarified with an indication of length of time between coppicing required to provide the structural variation objective.
- 11) Paragraph 6.2.3 (of the Native Trees and Shrubs section) needs to be split into two paragraphs: one covering the plant growth monitoring; and a separate paragraph for the more frequent actions of weed control and watering which will be crucial to successful early establishment. Likewise for Paragraph 6.3.2 (of the New Hedgerows).
- 12) Section 6.7 (Faunal Enhancements) does not provide any information on what will be installed and where. These enhancements need to be described and mapped in more detail so the user of the LEMP has a guide to what to maintain. This is not only relevant for the boxes but also for identifying the locations for cut grass and log piles as other sections of the LEMP will generate material to restock these piles.
- 13) There is no prescription (or reference to other documents) for maintenance of the play equipment or the path network. There is no cross-check of SuDS management requirements for maintenance of the drainage function (are these specified in a separate document?) and the vegetation management proposals given in 6.1.2.
- 14) Section 8 (On-going monitoring and remedial measures) needs to include submission of the 5-yearly monitoring report and any revisions to LEMP management prescriptions to Wokingham Borough Council for its records.
- 15) A number of different monitoring actions are given in section 6 and appendix 5796/LEMP/2. These should be listed in section 8 with the appropriate time of year for each action. A monitoring action of assessment of whether target habitats and conditions (against UK Habs and BNG criteria) have been met/maintained. Monitoring (colour coded to habitat) should be included in the works schedule given in appendix 5796/LEMP/3.

16) **Great Crested Newt**

I note that paragraph 5.8.5 of the Updated Ecological Assessment indicates that the eDNA survey results of nearby ponds were pending at the time of writing. Please can the further information and consequent evaluation be submitted as proposed in the report. It may be that this species needs to be mentioned in the LEMP as a species to consider during management of the site.

If these concerns are addressed in a revised submission, I would be able to recommend discharge of condition 16.

Conditions & Reasons (if required)			
n/a			
Date:	6 January 2025	Signed:	D. Fisher