

Technical Note 02

Project: 1005796-04

Planning Ref: 242665

Land West of Kingfisher Grove, Three Mile Cross

Consideration of Consultation Comments Received from WBC Ecology Officer

Date: March 2025

1 Introduction

- 1.1 Aspect Ecology Ltd is advising Sovereign Network Group in regard to ecological matters relating to the site, located west of Kingfisher Grove, Three Mile Cross.
- 1.2 The site is the subject of Outline planning permission, granted at appeal on 31 January 2023 (Appeal ref: APP/X0360/W/22/3304042, Application ref: 201002), for the proposed erection of 49 affordable dwellings with new publicly accessible open space and access. Further, subsequent reserved matters details have been developed and submitted to Wokingham Borough Council (Application ref: 242665) in relation to the permitted development, which were informed by updated ecological survey and assessment work.
- 1.3 Subsequently comments have been received from WBC Ecology Officer (dated 06 January 2025) in relation to the submitted information.
- 1.4 This note provides further consideration/response in regard to the relevant ecological matters set out within the consultation response, following the headings set out within the comments received.

2 Reserved Matters

- 2.1 The ecological comments received include a number of minor recommendations for amendments to the landscape design and boundary treatments relating to the reserved matters information. These are summarised within the table below, along with relevant response:

Recommendation within LPA Ecologist Comments	Response
Boundary treatment to the rear of plots 1 to 8 amended to brick wall to mitigate risk of garden encroachment	<i>Boundary treatment amended, as requested (refer to architect's drawings)</i>
Identification of location of retaining walls between individual residential plots to ensure ecological permeability	<i>It is understood that detailed levels information and associated location of retaining walls would be dependent on detailed engineering design following granting of reserved matters in respect of layout and accordingly, cannot be</i>

	<i>provided. If required, details of final retaining walls could be confirmed by condition.</i>
Identification of Hedgehog highways within boundary treatments	<i>Proposed hedgehog routes identified at Faunal Enhancement Plan (5796-04/LEMP3), taking into account likely locations of retaining structures based on levels information (where retaining structures are necessarily revised in line with the above, it is proposed that this plan be amended to ensure Hedgehog highways are achievable).</i>
Relocation of trees proposed away from southern and western edges of the wildlife pond	<i>Amended as requested – refer to Landscape Architect drawings (David Jarvis Associates), as appended.</i>
Relocation of trees away from power lines	<i>Amended as requested – refer to Landscape Architect drawings (David Jarvis Associates), as appended.</i>
Include restoration/replanting of former hedgerow H4.	<i>Amended as requested – refer to Landscape Architect drawings (David Jarvis Associates), as appended.</i>

3 Condition 13: Arboricultural Method Statement

- 3.1 Comments received in regard to Condition 13 relate to information prepared by others (Arboricultural Method Statement: ACD Environmental, ref: PRI24594aia-ams, July 2024), which are therefore addressed elsewhere.

4 Condition 15: Biodiversity Net Gain

Accompanying Metric Spreadsheet

- 4.1 The comments received set out that a copy of the completed Biodiversity Metric 3.1 spreadsheet has not been provided – a copy of the completed spreadsheet is provided to accompany this note (this has been updated in order to reflect the additional changes to the landscaping proposals, including as set out above and based on the latest proposed landscape masterplan – David Jarvis Associates Drawing Ref: 3249-5-2 DR-5000 P8, dated 21/02/2025, and therefore shows a slightly adjusted gain in habitat units of +15.33 units [+118.63%], which therefore remains substantially greater than the required 10% increase in line with the previously submitted information).

River Units

- 4.2 The comments received highlight that the current reserved matters proposals information does not demonstrate 10% biodiversity net gain under River Units category (noting that the previously submitted assessment informing the outline application identified a 10% gain in river units), requesting justification in regard to this.
- 4.3 Under the outline permitted information, additional River Units were identified due to the proposed inclusion of a new ditch along the west of the site, which was proposed as part of the approved outline surface water drainage strategy (and therefore incorporated within the previous BNG assessment to accurately reflect the proposed position).
- 4.4 As set out within the Drainage Strategy – Technical Note (Odyssey, July 2024), which informs the current reserved matters application, following the necessary further design it has been necessary to revise the surface water strategy as ‘there is no route to connect flows from the site to the ditch without crossing this party land’, such that it is necessary to discharge water

to a sewer and the location previously identified for the water-conveyancing ditch has necessarily been redesigned to form detention basins.

- 4.5 The existing ditches (which in any case, as set out within the submitted information, would likely no longer qualify for River Units due to their small size and failure to hold water for more than 4 months of the year) will remain unaffected within the open space areas, such that no loss of River Units would occur. As set out elsewhere, habitat enhancement measures are proposed (including within the riparian/edge habitats associated with the ditch), however (not least due to the lack of sufficient water flow within the ditches within the site), there is no potential to raise the condition of the existing ditches to 'moderate' condition under the criteria available in order to achieve a gain in River Units under BNG guidance.
- 4.6 Given that a water conveyancing ditch no longer forms part of the required surface water drainage strategy at the site and the existing ditches will remain unaffected, within open space areas (albeit subject to habitat enhancement measures), there is no potential to provide additional River Units within the site.
- 4.7 The current application is for reserved matters under the existing outline permission, which was granted prior to 12 February 2024 and therefore statutory biodiversity net gain requirements in place for planning applications under Schedule 7A of the Town and Country Planning Act 1990 do not apply in regard to the current submissions. Further, it is noted that the wording of planning Condition 15 specifically requires that *"details of how the development will achieve a biodiversity net gain of 10 % for habitats shall be submitted to and approved in writing by the Local Planning Authority"*, with no reference to watercourses/streams (or hedgerows), which are dealt with under separate categories within the metric.
- 4.8 Under the current reserved matters proposals, there will be no loss of River Units. The submitted BNG information demonstrates that the proposed development will result in significant gains in Habitat Units and Hedgerow Units (substantially in excess of 10% in the case of Habitat Units) and accordingly, overall it is considered that the current proposals will continue to demonstrate overall Biodiversity Net Gains in excess of 10% in line with relevant policy requirements and the stated requirements of planning condition 15.

Individual Trees

- 4.9 The comments received suggest that it would be appropriate to discount the number of [new] trees counted within the metric to allow for thinning of trees during the relevant 30 year period.
- 4.10 The number of individual trees proposed within the development are identified based on the proposed landscape scheme and therefore have been included within the BNG metric in order to accurately reflect the proposed information. The trees will be managed (in line with information set out elsewhere) in the long term (with replacement planting provided in respect of failed specimens in line with planning requirements). As such, there is no reason to suggest the indicated number of individual trees would not be retained in the long term. (Indeed given the size of the site it is not considered that the numbers or density of individual trees would be excessively densely planted, nor within large groups, based on the landscape masterplan).
- 4.11 With regard to individual trees (in line with the management information set out elsewhere) it is not anticipated that individual (specimen) trees would be removed as part of thinning activities within the stated 30 year timeframe – any removal of entire trees (in contrast to thinning of foliage) would be anticipated in relation to shrubs/scrub and woodland planting (which is not included in the totals for individual standard trees, in line with BNG guidance).

There is no guidance available to indicate any reduction in tree numbers to account for future losses (should these occur) and as such, bearing in mind the stated intention to provide and manage the individual trees shown in the long term, any proposed discount to the numbers included within the BNG assessment would be arbitrary and would not accurately reflect the proposed information put forward. Indeed, it is noted that (in line with current BNG guidance), that all new trees are necessarily identified as small trees (with associated areas, reflecting their size at the time of planting) whereas in line with standard growth rates a proportion of these (particularly those located within the wider open space away from developed areas) would be anticipated to have achieved 'moderate' size, with consequent (substantial) increase in their associated likely BNG 'score' at the end of the 30 year period, which is not taken into account.

- 4.12 As such, it is not proposed to reduce the number of trees identified in the metric (whilst in any event, it is noted that, even should the value attributed all of the proposed individual trees be removed, the overall increase in Habitat Units would remain substantially above 10%).

5 Condition 16: Landscape Environmental Management Plan

- 5.1 The response received sets out a number of individual minor comments and concerns in relation to the submitted LEMP document, requesting that these are addressed (predominantly through minor amendments or addition to the existing text) within a revised submission in order to facilitate discharge of the condition.
- 5.2 An amended LEMP document, incorporating the comments raised is provided to accompany this note in order to address the concerns raised.
- 5.3 In addition, the comments received highlight that further Great Crested Newt eDNA survey information was awaited at the time of submission and requests that this information is provided in order to confirm any relevant management implications that may need to be considered within the LEMP (should Great Crested Newt be present). The results of the additional (update) eDNA survey work has been provided to WBC (Aspect Ecology, December 2024), which confirms (in line with the previous information) the conclusion that Great Crested Newt is unlikely to be present at the site and as such, no further consideration would appear to be required in regard to this species.

6 Other Considerations

- 6.1 With the exception of the individual matters discussed above, no other specific ecological considerations or concerns in relation to the submitted information appear to be raised within the comments received.

Appended

- *Landscape Masterplan (David Jarvis Associates), dated 14/02/2025*

Provided to Accompany this Note

- *Completed Biodiversity Metric 3.1 spreadsheet (dated 07-03/2025 – file ref: 5796-04 BNG 3.1 vf3 250703)*
- *Updated Landscape Environmental Management Plan (including Plan 5796/LEMP3: Proposed Faunal Enhancements)*



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