

MEMORANDUM

From:	Louise Aparo Ecology Officer		
Service	WBC Ecology	App No:	252255
Address:	Unit 1, 171 Evendons Lane, Wokingham, RG41 4EH.		
Proposal:	Application for submission of details to comply with the following condition of planning approval 231351 dated 12.11.2024. Condition 3 relates to materials, 4 to ground and building levels, 6 to construction management, 9 to landscape details (large scale), 11 to protection of existing trees, 12 to landscape management plan, 13 to earth mounding and contouring, 14 to hedgerows, 15 to contamination, 17 to cycle parking, 18 to details of car and motorcycle parking, 20 to vehicle turning, 21 to construction access, 22 to access, 25 to travel plan, 26 to walking and cycling strategy, 27 to LEMP, 28 to ecological permeability, 29 to details of boundary walls and fences, 30 to noise impact assessment, 31 to odour extraction details, 32 to drainage, 35 to BREEAM compliance, 37 to communications plan, 42 to bat Licence.		
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

The documents reviewed in support of discharging these conditions relate to the granted outline planning permission and are also relevant to, and should be read in conjunction with, Reserved Matters Application 252179. The comments made in respect of these conditions, particularly those concerning ecological enhancements and Biodiversity Net Gain, are therefore also applicable to the Reserved Matters application

Condition 6: Construction Environmental Management

With regard to lighting, the CEMP provides construction-phase lighting specifications that align with the precautionary measures for bats set out in the Ecological Appraisal approved at outline stage. These include the use of

downward-facing luminaires, a 2700-kelvin light specification, and motion-sensor activation. In addition, the location of the storage facility has been revised to a more appropriate position that reduces potential impacts on key bat foraging corridors.

Although the CEMP does not set out species-specific precautionary measures in detail, it does summarise the headline mitigation requirements, all of which are described comprehensively within the Ecological Appraisal. As the CEMP explicitly states that it will adhere to the mitigation measures outlined in Aspect Ecology's Ecological Appraisal (May 2023), I am satisfied that it complies with the mitigation requirements secured through the Decision Notice.

Condition 14 hedgerows

Following previous ecological comments, the buffer zone has been amended from a 2m buffer zone to a 10m buffer zone, as per the Decision Notice, as such this Condition can be discharged.

Condition 27 LEMP

Following previous ecology comments, an Ecology Comments document was submitted in response to the Council's Ecology Memo. This document states that amendments have been made to the Landscape and Ecological Management Plan (LEMP) in line with the Local Planning Authority (LPA) comments. However, these changes are not reflected in the updated LEMP (Revision D, dated 16/01/26). In addition, no revised Biodiversity Net Gain Assessment (BNGA) has been submitted. A Biodiversity Net Gain Assessment (BNGA), dated 6 October 2025 and prepared by Pioneer Environment, was submitted in support of this condition to provide updated information on the proposed habitat creation. The BNGA is intended to inform the discharge of the LEMP and accompany the associated Reserved Matters application. However, inconsistencies remain between the submitted documents.

In particular, the previous ecology comments raised concerns regarding the incorrect categorisation of private lawns as 'modified grassland'. The submitted Ecology Comments document states that this has been amended within the Soft Landscape Masterplan and Landscape Plans 1–5, which is welcomed. However, this change has not been carried through to the LEMP. Table 1 of the LEMP still identifies proposed lawn areas as 'modified grassland'.

Furthermore, earlier comments clearly specified that any reclassification must be applied consistently across the LEMP and the BNGA to ensure alignment. This has not yet been achieved. The LEMP continues to describe vegetated gardens as 'modified grassland', and this classification is also reflected in the Biodiversity Net Gain Habitat Plan.

For clarity, the previous ecology comment stated:

"The Statutory Metric submitted within the BNGA classifies areas of private lawn as 'poor' modified grassland. However, the Statutory Metric User Guide defines a private garden as land within the curtilage of a privately owned or tenanted dwellinghouse. When recording habitats at the post-development stage, gardens that have no public access and where biodiversity cannot be legally secured should be recorded as 'urban – vegetated garden' or 'urban – unvegetated garden'. Landscape Plans 1–5 (Revision P04) identify areas described as 'private lawn'.

The Design Statement submitted under the Reserved Matters application confirms these areas are private, secure resident gardens and patios. Where long-term management and condition cannot be secured through the HMMP, all such private 'lawns' should be recorded as 'urban – vegetated garden'. Any reclassification must be applied consistently across the BNGA and the LEMP and clearly shown on the Biodiversity Net Gain Proposed Habitat Plan."

Following the previous memo comments, the planting schedule (specifically the ground cover and shrub species listed in Table 23) has been revised to include pollinator-friendly species. The selected species and proposed quantities will provide biodiversity benefits, and the balance between pollinator species and ornamental planting is considered acceptable. In addition, the management prescriptions have been updated to include more specific and detailed measures, which is welcomed.

All that now remains is to ensure that the agreed reclassification from 'modified grassland' to 'urban – vegetated garden' is consistently reflected within the LEMP, the Biodiversity Net Gain Proposed Habitat Plan, and the Biodiversity Net Gain Assessment.

Condition 28 Ecological permeability

The Ecological Permeability Scheme has been updated and now includes specific prescriptions for delivering the proposed wildlife enhancements.

Paragraph 4.22 states that, to mitigate the loss of bat-roosting opportunities, bat boxes will be installed. The exact number and type of boxes will be determined by a specialist ecologist.

As the required quantity has not yet been confirmed—and is necessary for completion of the Ecological Permeability Plan—it is assumed that each bat symbol shown on *Figure 3: Species-Specific Enhancement Plan* represents the installation of two bat boxes. The quantity should be referenced within the Ecological Permeability scheme to ensure its secured, once completed this condition can be discharged.

Summary:

All that remains to discharge the remaining conditions (Condition 27-LEMP and Condition 28 – Permeability Scheme).

Condition 27

- Revise Table 1 – modified grassland to vegetated gardens, this revision should show an update in metric units.
- Submit an updated version of the Biodiversity Net Gain Assessment to reflect changes of modified grassland to vegetated gardens
- Change the Biodiversity Net Gain Habitat Plan to reflect change from modified grassland to vegetated gardens.

Condition 28

Revise Paragraph 4.22 to specify the quantity of bat boxes. If the quantity is defined by the low impact licence, please state this clearly. Otherwise, amend the paragraph to clarify that each bat box symbol shown represents two bat boxes per type

Conditions & Reasons (if required)

N/A

Date:	17/02/26	Signed:	L.Aparo
--------------	----------	----------------	---------