

Ms Connie Davis
Development Management
Wokingham Borough Council

By Online Submission Only

6th December 2024

Original Application Number: 21/1081 - Discharge of Condition applications 241901, 240581, 242228

**Barkham Farms (High Barn Farm and part of Brook Farm and Rooks Nest Farm),
Barkham RG40 4EX**

Full application for EIA development for the proposed installation of a new 52ha solar farm for a temporary period of 25 years including underground grid connection between site and Electricity Distribution Centre, laying of internal access road, the erection of substation building security fencing and associated landscaping with approximately 3.4ha of tree planting for carbon sequestration.

Background

This submission deals with additional information submitted in relation to Conditions 5, 10, and 15 to complement information already submitted in the following formal Discharge of Condition applications:
24/0581, 24/1901, 24/2228

The submission is in direct response to comments made by Highways and Ecology and so the following table seeks to assist the LPA by explaining how each consultee comment has been addressed.

The Submission

Condition 5 relating to landscaping details

Highways requested:

1. Details of the haul road construction.
2. Details of the internal access road.

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3. Clarification of the correct references for construction details

These are all provided in the following submitted drawings.

Haul Road Proposed Levels Sheet 1	BFSF-CURT-XX-DR-C-9400
Haul Road Proposed Levels Sheet 2	BFSF-CURT-XX-DR-C-9401
Haul Road Proposed Levels Sheet 3	BFSF-CURT-XX-DR-C-9402
Haul Road Proposed Levels Sheet 4	BFSF-CURT-XX-DR-C-9403
Haul Road Proposed Levels Sheet 5	BFSF-CURT-XX-DR-C-9404
Construction Details Sheet 1	BFSF-CURT-XX-DR-C-9281
Construction Details Sheet 2	BFSF-CURT-XX-DR-C-9282

Condition 10

Highways Comments

1. No response required.
2. Information to be provided on each of the signs – Comment from WBC client side, 'Directional signage and destinations will be agreed with the Council's Highways/Countryside Team in advance of installation'.
3. No response required.

Condition 5 and Condition 15.

Ecology comments have been collated into the following table with response and deliverables outlined in the corresponding column. This deals with both Condition 5 and Condition 15.

Please let me know if you require any further information to assist you discharge these conditions positively.

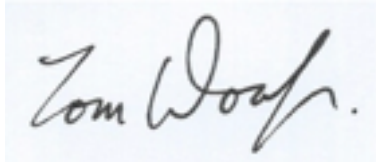
ECOLOGY - Original Comment Received	Amendments
Condition 5 – Landscape Details	
1. The hedgerow proposed alongside the greenway adjacent to fields 8 and 6 (as shown in both Landscape General Arrangement Sheet 2 of 2 and Landscape Planting Plan Sheet 2 of 2) and field 4 (as shown in both Landscape General Arrangement Sheet 1 of 2 and Landscape Planting Plan Sheet 1 of 2) is too close to the greenway. This means that they have no growing space. It will not be possible to follow the LEMP management prescription of cutting the hedgerow only every other year because of the pressure to maintain an open greenway. There needs to be greater separation between the greenway and the line of the hedgerows.	1) BFSF-RAMB-XX-DR-L-3002 (Landscape GA Sheet 2 of 2) amended, aligned distance between greenway and hedge line throughout. Added amended road crossing as per comment received. 2) BFSF-RAMB-XX-DR-L-3012 (Landscape PP Sheet 2 of 2) amended, aligned distance between greenway and hedge line. Fence moved near field 6 due to movement of hedge. Footpath updated across. 3) BFSF-RAMB-XX-DR-L-3001 (Landscape GA Sheet 1 of 2) amended, aligned distance between greenway and hedge line throughout. 4) BFSF-RAMB-XX-DR-L-3011 (Landscape PP Sheet 1 of 2) amended hedge line throughout near field 4, moved fence to match. Footpath updated across. Road Crossing added as per comment received.
2. The greenway through field 2 (as shown in both Landscape General Arrangement Sheet 1 of 2 and Landscape Planting Plan Sheet 1 of 2) is too close to the existing hedge on the southern edge of the field. This is confirmed in the cross section shown in Landscape Details Sheet 2 of 9 where the hedgerow is shown growing into the space above the greenway. It will not be possible to follow the LEMP management prescription of cutting the hedgerow only every other year because of the pressure to maintain an open greenway. There needs to be greater separation between the greenway and the line of the hedgerow.	1) BFSF-RAMB-XX-DR-L-3011 (Landscape PP Sheet 1 of 2) moved hedge as per cross-section specification. 2) BFSF-RAMB-XX-DR-L-3001 (Landscape GA Sheet 1 of 2) moved hedge as per cross-section specification.
3. The Planting Schedule includes the species <i>Prunus padus</i> (Bird Cherry) and <i>Quercus petraea</i> (Sessile Oak) within the RUK Wet Woodland Understory mix. These species are not native to this part of the country and are not suited for this mix and location. I recommend swapping them for <i>Frangula alnus</i> (Alder Buckthorn) and <i>Rhamnus cathartica</i> (Buckthorn).	1) BFSF-RAMB-XX-DR-L-3013 (Planting Schedule) amended following comment.
4. The Planting Schedule includes the species <i>Tilia cordata</i> (Small-leaved Lime) within the RUK Woodland Core mix. This species is inappropriate for the soil conditions in the locations proposed for this mix. I recommend that it removed from the mix with the percentages of the other species increased.	Commentary added to BFSF-RAMB-XX-RP-L-3202 (LEMP): 'As per the planting schedule for the woodland area and management plan as approved under application 230242'.
5. The Planting Schedule includes the species <i>Viburnum opulus</i> (Guelder Rose) within the RUK Woodland Edge mix. This species is inappropriate for the soil conditions in the locations proposed for this mix. I recommend that it is swapped for <i>Rhamnus cathartica</i> (Buckthorn).	

6. The RUK Woodland Edge mix numbers and RUK Woodland Core mix numbers given in the Landscape Planting Plan Sheet 2 of 2 do not matchup with those given in the Planting Schedule. The Landscape Planting Plan Sheet 2 of 2 appears to be double counting the area by giving full weight to the whole of both mixes for the entire area that will be a combination of the mixes. The planting plan needs to be corrected.	
7. Both the Landscape Planting Plan Sheet 2 of 2 and the Planting Schedule give tree planting numbers that do not match the staggered grid spacing that is set out in Landscape Details Sheet 5 of 9. The spacing given in Sheet 5 of 9 is not 1.5m centres referenced in the Planting Schedule. These three specification sheets need to be coherent. As the Woodland Edge mix is specified for the same location as the Woodland Core mix, Sheet 5 of 9 should detail how to distribute these two mixes within the locations specified.	
8. The proposed spacing shown in Sheet 5 of 9 could be considered acceptable if the ongoing management of the woodland is on a short-term coppice rotation. The LEMP proposes coppicing as a management operation and specifies a relatively short-term cycle. However, the planting mixes proposed do not match this objective. If coppice is to be the preferred management option, the proportion of <i>Corylus avellana</i> (Hazel) needs to be much higher, at about 75% with the remaining 25% being split over the other species. If the preferred management option is to generate an uneven, lower intervention woodland, the planting density should be greatly reduced – circa 3m centres, if the current % mixes are to be used.	
9. Landscape Details Sheet 3 of 9 and the Landscape Specification includes tree protection measures for 1+1 transplant sized trees. I am concerned that there will be a high failure rate for these trees because they have a spiral guard only and will be prone to browsing damage. I recommend that 1.2m tree guards are used, perhaps with a slightly larger tree size. It is better to establish a lower density of trees well, than have high failure rates of densely planted trees with inadequate protection.	1) BFSF-RAMB-XX-DR-L-3023 (Landscape Details Sheet 3 of 9) size of tree guard modified to 1.2m. 2) BFSF-RAMB-XX-SH-L-3203 (NBS Landscape Specification) page 23 includes 1.2m height of guard.
10. Landscape Details Sheet 3 of 9 does not include a specification for light standard and branched trees as specified in the Planting Schedule for the trees in the RUK Woodland Core mix. I question whether this size of tree is required at the planting density proposed. Should a slightly smaller tree size be specified (still with the 1.2m tube protection)?	Commentary added to BFSF-RAMB-XX-RP-L-3202 (LEMP): 'As per the planting schedule for the woodland area and management plan as approved under application 230242'.

Condition 15 – Landscape and Ecological Management Plans	
1. It is good that monitoring of the habitats is proposed and the target years indicated in paragraphs 8.0.4, 8.4.16, 8.4.27, 8.4.39, and 8.4.49. These have not been transferred into Table 10.1 as actions in the first five years. In particular it needs to be shown when in the year the monitoring is required in order to best assess whether management is on target (this potentially being different for different habitats). Please can this be added.	BFSF-RAMB-XX-RP-L-3202 (LEMP) table 10.1 has added information to reflect this
1. It is unclear what the end type of woodland proposed to be created on the southern edge of the site is. Paragraph 8.4.7 indicates an uneven aged woodland would be sought. Paragraph 8.4.5 proposes coppicing. The planting density would be right for coppicing but the species mix is not correct for this. The LEMP needs to be clearer. If coppice woodland is desired then the species mix at planting needs to be adjusted. The LEMP should then set out proposed coupes to allow a degree of rotational coppicing – the whole block should not be cut in one go. If an uneven aged woodland is desired then the planting spacing can be increased (total number of trees required to be planted is smaller) and some guidance should be given as to frequency and patch size of intervention over the following 30 years to help introduce the structural heterogeneity. I recommend the LEMP is updated to be clear about the woodland type objective and the steps to get there.	Commentary added to BFSF-RAMB-XX-RP-L-3202 (LEMP): 'As per the planting schedule for the woodland area and management plan as approved under application 230242'.
1. The LEMP does not refer to any biodiversity net gain habitat condition assessment criteria and associated targets to achieve. This may well mean that actions required to establish to a certain biodiversity net gain condition score will be missing. I recommend that the LEMP includes reference to target habitat condition for biodiversity net gain and reviews the proposed actions in light of these targets.	Comment by Consultee: 'Happy to push the BNG objectives to a later date. At some stage, if BNG units are to be secured for off-site sale, there will need to be a management plan revision and a clear disentangling of what is delivered as a requirement of this development and what can be shown to be additional.' 1- Agreement not to make any amendments. BNG won't be mentioned in the LEMP.
Drawing mentioned is BFSF-CURT-XX- DR -C- 9281 , appended both 9281 and 9282.	Modified BFSF-RAMB-XX-DR-L-3022 Rev P03 plan, added BFSF-CURT-XX-DR-C-9282 to the referenced documents.

Please let me know if you require any further information to assist you discharge these conditions positively.

Yours faithfully



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