
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	251413
Address:	Robin Lodge Nursery, Part Lane, Swallowfield, Wokingham, RG7 1TB.		
Proposal:	Proposed erection of 2no. buildings and open log store with associated parking, access and landscaping, repositioning of site boundary fence, plus installation of acoustic screen following demolition of existing buildings.		
Type of Development:	Major All other developments		
Site Visit Made:	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

I have read the Preliminary Ecological Appraisal (John Wenman Ecological Consultancy Ref: R2623_PEA_a, February 2024), Biodiversity Net Gain Report (John Wenman Ecological Consultancy ref.: R2623_BNG_a June 2025), and Provisional Environmental Assessment (including Phase 1 bat survey) and Appendix 2 Reptile Presence/absence Survey (Dr Jonty Denton, April 2022). I have also reviewed the Acoustic Assessment, Planning Design and Access Statement, Arboricultural Development Report and Flood Risk Assessment, the plans and drawings submitted in support of the application, as well as site photos and planning history.

Preliminary Ecological Appraisal

The Ecologist summarizes in section 1.1.7 the ecological mitigation and compensation which will need to be secured for the development to comply with national and local plan policy and best practice: This must include:

- Habitat protection and compensation measures
- Retention and protection of oak and monolith to protect potential roost features.
- Avoidance of artificial lighting and light spillage onto the off-site stream, scattered trees and scrub boundaries to protect foraging and commuting habitat for bats.

- Precautionary measures during site clearance and construction for amphibians and reptiles.
- Precautions during scrub and tree clearance for nesting birds; and
- ecological enhancements.

While Section 2 acknowledges that Himalayan balsam (*Impatiens glandulifera*) was noted along the bunds on the northern and western boundary, the Ecologist fails to propose a management strategy for eradication of the invasive weed or inclusion of management in Construction Environmental Management Plan (Biodiversity) or Habitat Management and Monitoring Plan or LEMP.

To secure retention and protection during clearance and construction and ensure maintenance and enhancement for wildlife and protected species in the landscaping and operation al phases for 30 years from completion, revised detailed landscape planting, CEMP Biodiversity, and wildlife enhancement strategy must be included in planning conditions.

Biodiversity Net Gain

I am satisfied with classification of habitats recorded by JWEC's ecologist on the site. I agree with the baseline habitat units set out in the BNG Report Table 1, the condition assessments and the submitted Statutory Metric dated 17 March 2025. I agree that on-site baseline unit value is 5.52 units. 0.09 units of modified grassland, 0.36 units of scrub and 0.2 units of rural trees of low to moderate would be lost as a result of the development proposals.

I note the Trees and Landscape Officers comments. In order to maintain and enhance wildlife and protected species population in accordance with Local Plan policies CP3, CP7 and MDD TB23 I recommend that submission and approval of Landscape Proposals Plan that includes the meadow grassland, scrub habitats and locally native tree planting is secured by condition. I do not support all the detail of the Proposed Habitat Plan which should be revised to secure creation of priority grassland and wherever possible retain and enhance existing biodiversity habitats.

The on-site mitigation and the compensation required to achieve the 37% biodiversity net gain as assessed, submission and approval of a Biodiversity Gain Plan must be secured in accordance with regulations and TCPA. In order to secure implementation of the on-site Habitat Maintenance and Monitoring Plan must be submitted and approved by the LPA and implemented as approved. A BNG monitoring contribution obligation and implementation of the approved HMMP must be secured by S106 agreement.

Summary

Provided the landscaping is revised to provide wildlife priority biodiversity and formal landscaping is limited, and conditions for a CEMP Biodiversity, ecological enhancement, an external lighting strategy, Biodiversity Gain Plan and a HMMP and a monitoring contribution obligation are secured are no ecological objections to the development proposed.

Conditions & Reasons (if required)

Condition: The Biodiversity Gain Plan shall be prepared in accordance with the Biodiversity Net Gain Report dated June 2025 Reference R2623_BNG_a, the UKHab Survey Plan dated February 2024 and Statutory Biodiversity Metric dated 17

March 2025 prepared by John Wenman Ecological Consultancy.

The biodiversity gain plan must include:

- a) information about the steps taken or to be taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat;
- b) the pre-development biodiversity value of the onsite habitat;
- c) the post-development biodiversity value of the onsite habitat;
- d) any registered offsite biodiversity gain allocated to the development and the biodiversity and the biodiversity value of that gain in relation to the development;
- e) any biodiversity credits purchased for the development; and
- f) any such other matters as the Secretary of State may by regulations specify.

Reason: To secure implementation of the Statutory Biodiversity Gain Condition.

Condition: The development shall not commence until a Habitat Management and Monitoring Plan (the HMMP), prepared in accordance with the approved Biodiversity Gain Plan has been submitted to, and approved in writing by, the local planning authority and including:

- (a) a non-technical summary;
- (b) the roles and responsibilities of the people or organisation(s) delivering the HMMP;
- (c) the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- (d) the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- (e) the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.

Reason: To set out the actions needed to create and enhance habitat onsite and ensure delivery of on-site biodiversity habitat, hedgerow and watercourse units. Relevant policy: NPPF Section 15 and paragraph 198, Article 35 of the Town and Country Planning (Development Management Procedure) (England) Order 2015, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Unless previously agreed in writing by the council all works are to be carried out in full accordance with the mitigation recommendations and ecological enhancements given in Section 9 of the submitted Preliminary Ecological Appraisal (John Wenman Ecological Consultancy Ref: R2623_PEA_a, February 2024) and Section 7 of the Biodiversity Net Gain Report (John Wenman Ecological Consultancy ref.: R2623_BNG_a June 2025),

Reason: To ensure that protected and priority species and retained biodiversity habitats are not adversely affected by the proposals. Relevant policy: Local Plan Core Strategy policies CP3 and CP7 and MDD policy TB23.

Condition: Prior to commencement of the development, details of biodiversity enhancements, to include bird and bat boxes on the new buildings and around the site, native species landscaping habitat and restoration shall be submitted to and

approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved. **Reason:** To incorporate biodiversity in and around developments in accordance with paragraph 187 of the NPPF Relevant policy: Core Strategy Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition CL5 Prior to the commencement of the development, full details of both hard and soft landscape proposals shall be submitted to and approved in writing by the local planning authority. These details shall include, as appropriate, proposed finished floor levels or contours, means of enclosure, car parking layouts, other vehicle and pedestrian access and circulation areas, hard surfacing materials and minor artefacts and structure (e.g. refuse or other storage units, signs, external services, etc). Soft landscaping details shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate, and implementation timetable.

All hard and soft landscape works shall be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a timetable approved in writing by the local planning authority. Any trees or plants which, within a period of thirty years after planting, are removed, die or become seriously damaged or defective, shall be replaced in the next planting season with others of species, size and number as originally approved and permanently retained.

Reason: To set out the actions needed to create onsite habitat maintain and enhance wildlife populations. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan TB23.

Condition: No works shall take place (including excavations for services, demolition, ground works, vegetation clearance, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal) until a construction environmental management plan (CEMP: Biodiversity) prepared in accordance with the recommendations in Section 9 of R2623_PEA_a (JWEC, February 2024) has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following:

- a) Risk assessment of potentially damaging construction activities.
- b) Identification of "biodiversity protection zones".
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).
- d) The location and timing of sensitive works to avoid harm to biodiversity features.
- e) The times during construction when specialist ecologists need to be present on site to oversee works.
- f) Responsible persons and lines of communication.
- g) The role and responsibilities on site of qualified ecological clerk of works (ECoW) or similarly competent person.
- h) Use of protective fences, exclusion barriers and warning signs.

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

(See BS42020:2013 Clause 10 for a comprehensive list of issues and activities that

may be considered and included within a CEMP).

Reason: To ensure that biodiversity habitat, protected and priority species are not adversely affected by the proposals. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan TB23.

Condition: Prior to the commencement of development, an invasive non-native species protocol shall be submitted to and approved by the local planning authority, detailing the containment, control and removal off-site. The measures shall be carried out strictly in accordance with the approved scheme.

Reason: To set out the actions needed to create onsite habitat maintain and enhance wildlife populations. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan TB23.

Condition: No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the written approval of the local planning authority. If within a period of **thirty years** from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted at the same place, unless the local planning authority gives its written consent to any variation.

Reason: To ensure that retention and enhancement of biodiversity in accordance with the Biodiversity Gain Plan and HMMP. Relevant policy: NPPF section 15, Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan TB23.

Condition CL8

Reason: To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of biodiversity value to the area, and to allow for verification by the local planning authority that the necessary measures are in place before development and other works commence Relevant policy: Core Strategy policies CP3 and CP7 Managing Development Delivery Local Plan policies TB21 and TB23.

Condition: Prior to commencement of development a lighting design strategy for biodiversity for shall be submitted to and approved in writing by the local planning authority. The strategy shall:

a) identify those areas/features on site that are particularly sensitive for bats, birds and amphibians, and that are likely to cause disturbance in or around their breeding sites and resting places or along important routes used to access key areas of their territory, for example, for foraging; and

b) show how and where external lighting will be installed (through the provision of appropriate lighting contour plans and technical specifications) so that it can be clearly demonstrated that areas to be lit will not disturb or prevent the above species using their territory or having access to their breeding sites and resting places.

All external lighting shall be installed in accordance with the specifications and locations set out in the strategy, and these shall be maintained thereafter in accordance with the strategy. Under no circumstances should any other external lighting be installed without prior consent from the local planning authority.

Reason To ensure that wildlife and priority species are not adversely affected by the proposals. Relevant policy: NPPF paragraph 198 Section 15 Local Plan Core

Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Prior to the commencement of the development, details of earthworks shall be submitted to and approved in writing by the local planning authority. These details shall include the proposed grading and mounding of land areas including the levels and contours to be formed, showing the relationship of proposed mounding to existing vegetation and surrounding landform. The Earthworks shall be carried out in accordance with the approved details and permanently so retained.

Reason: To safeguard and ensure that biodiversity habitats, protected and priority species are not adversely affected by the proposals. Relevant policy: Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan TB23.

Date:	10/09/25	Signed:	T Cuss
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