

# MEMORANDUM

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|-----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------|--------|
| <b>From:</b>                | Tina Cuss<br>Ecology Officer                                                                                                                                                                                                                                                                                             |                |        |
| <b>Service</b>              | WBC Ecology                                                                                                                                                                                                                                                                                                              | <b>App No:</b> | 242364 |
| <b>Address:</b>             | 105 Colemans Moor Road, Woodley, Wokingham, RG5 4DA.                                                                                                                                                                                                                                                                     |                |        |
| <b>Proposal:</b>            | Application for submission of details to comply with the following conditions of planning consent 240833 dated 19/08/2024. Condition 4 relates to a Construction Environmental Management Plan (CEMP); 5 to hard and soft landscaping; 6 to drainage details; 7 to biodiversity enhancements and 8 to a lighting scheme. |                |        |
| <b>Type of Development:</b> |                                                                                                                                                                                                                                                                                                                          |                |        |
| <b>Site Visit Made:</b>     | 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 reviewed the CEMP Plan (Anon), Construction Method Statement, Demolition Method Statement, Landscape Proposals Plan, Private Drainage Layout Dwg 200 P2, and Surface Water Drainage and SUDS Strategy Report, Biodiversity Enhancements Lighting Design Light Control Measures,

### Construction Method Statement

Section 6 of the Safety Method Statement Demolition Phase Health & Safety Plan states that the seequence of work programme is to follow. It is therefore not clear when the site set-up and vegetation clearance and demolition are proposed and whether the constraints of the Reasonable Avoidance Measure for reptiles and mitigation for breeding birds and the sequence of operations needed is understood and will be taken into account by the contractor. The Demolition Phase Plan and the Construction Method Statement don't state that the roof coverings will be removed undersupervision by hand. Unless the Construction Method Statement is revised to include the methodology and schedule for scrub, tree and grassland clearance, reptile reasonable avoidance measures particulary for dismantling the spoil and material storage piles the submissions fail to address the requirements of condition 4 and the condition must not be discharged. The PEAR stated that a toolbox talk should be given to all relevant personal by a suitable qualified ecologist before any

works commence on-site to outline ecological constraints and the required mitigation measures. I am concerned that the Construction Method Statement has not been informed by the PEAR. I recommend that the Project Ecologist should give input to, and/or review the CEMP and CEMP Layout, including the schedule and detail of timings before a revision is resubmitted to the Council.

I disagree that the development will not result in any loss to suitable habitat for breeding birds. The removal of dense brambles is needed and the CEMP must include a schedule, details of timing of operations and works which need to be supervised by an ecologist as well as identification of suitable reptile and breeding bird habitat on the CEMP plan. The CEMP schedule needs to include timing of erection of protective fencing after the clearance of reptile habitat but before site set-up and commencement of groundworks, demolition or service installation. The CEMP does not address potential for light pollution on retained and protected habitat or habitat in the adjoining properties and does not consider the impact of light pollution on notable species including bats.

From the Site Investigation Report it is clear that trenches or excavations have been left open and plant has been operational on site and habitat clearer before reptile mitigation strategy has been implemented. The CEMP makes no reference to the need to cover trenches or include planks to allow any wildlife to escape. The trial pits have been dug in the area of the bramble scrub biodiversity habitat. I request a review of the avoidance measures and protection of species and habitat and revision of the CEMP Layout and provision of the schedule and details of timing to ensure that the storage and loading/unloading zones are located away from the zones which must be located to avoid harm to biodiversity features (including the bramble and the log and hardcore piles previously identified in the PEAR). The northern extent of the construction site must be reduced in order to protect the soils where the native boundary hedge and trees will be established. Contractor parking and construction site hard surfacing should not extend over the area where the front and side boundary hedges will be proposed.

Initial Physical Investigations



During the site visit an excavator was used to carry out three trial pits along the south western boundary of the site, beyond which lay the old engineering works. The locations are shown

Rear garden to the north of B1.



Image 10

Fox trail from south to north in the rear garden.



### **Landscape Proposals Plan**

I support moving the cycle stores to the front of the property. However, the loss of tree planting and hedgerow to the front of the property has not been off set. In addition the native species rich hedge to front and side boundaries has been missed from the Landscaping Proposals Plan. I therefore cant support approval and it should be revised to be consistent with the Proposed Site Plan Dwg 2159\_005 Rev B and the hedge shown in the Proposals Habitat Plan in the PEAR. Escallonia is a low growing non-native ornamental and will not provide adequate compensation for the trees, boundary hedges and scrub to support wildlife on site. Proposed Site Plan Dwg 2159\_005 Rev B showed 5 trees would be planted in the back garden and 2 in the front. Landscape Proposals 0413DW L1 RevA included 2 trees in the front garden and 6 in the rear. PEAR section 7.9 recommended native species-rich hedgerows will enhance connectivity and provide refuge for small mammals. Suitable species would include Common Beech, Hawthorn, Rowan (and Crab Apple. None of the species recommended by the Ecologist are currently propose in the landscaping scheme. Planting fruit trees for invertebrates was also reocmmended which is not also not reflected in the Landscaping Proposals Plan.

In line with PEAR paragraph 8.13, hedgehog gaps of at least 13x13cm must be provided in all of the fences including the side fence of plot 2. This will maintain a permeable corridor between the habitat to the north, plots 1 and 3 and the sites to the east and west, and discourage hedgehogs from accessing Colemans Moor Road. It is unlear why there is a second fence inside plot 1.

For the above reason request that the Landscape Proposals Plan is amended revised to include native hedges in the front garden including a front hedge minimum 1.8m high, and 7 replacement trees are proposed as approved by the LPA and a 3 hedgehog gaps are provided in the fences of plot 2. The details of when the site preparation and planting and seeding/turf will be completed should also be secured.

### **Ecological Enhancements**

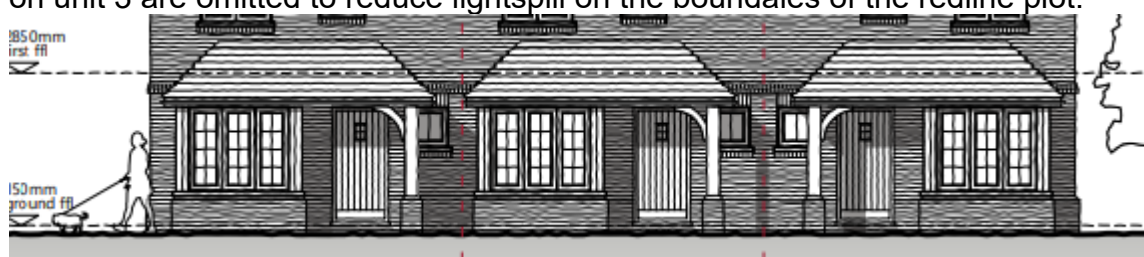
I request that the bee box is relocted so that it is close to vegetation, but where plants wont obscure or shade the entrance. The PEAR recommended that bat tubes and bat boxes be integrated with the 3 units. It is not clear from the Ecological Enhancements document how many bat access tiles and how many integrated

tubes the applicant proposes to provide, which should therefore be confirmed prior to discharge of condition 7.

### Lighting design strategy for biodiversity

The submitted report does not demonstrate that so many bollard and wall lights are needed. I am not able recommend approval of a lighting strategy unless half the wall light on the porches next to the bay windows are omitted as they aren't shown to serve any health and safety purpose. No contour plans have been provided to show that a single light next to the front door would not provide adequate light and in addition light spill would be partly shielded by the porch roof.

The lighting report does not justify the provision of pairs of lights on the rear of the properties. I am happy to agree to the provision of one 9W LED 3000K Downward Wall Lights on the rear of each unit, if the western light on unit 1 and eastern light on unit 3 are omitted to reduce lightspill on the boundaies of the redline plot.



The lighting report does not demonstrate that one 10W bollard light per car parking space is needed. Lights should provide as low lux as is necessary for health and safety. I request that the number and watts of the bollards are reviewed and numbers and watts/lux are reduced. Subject to the advice of the specialist, consideration could be given to positioning the bollards on the edge between car parking spaces as lighting in car parking spaces next to porches will create high contrast and appears unnecessary. I request that the applicant agrees to setting PIR controls to 1 minute delay, in order to recommend discharge of contion 8. I am willing to agree the Light Spill Control Measures.

### Conditions & Reasons (if required)

Awaiting a revised CEMP report and layout, amended landscaping layout plan, and minor changes to the ecological enhancements which address the details, timing and scheduling required by the relevant conditions and the replacement planting and protected species mitigation avoidance measures outlined in the PEAR and detailed in the approved Site Plan.

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| <b>Date:</b> | 4/11/24 | <b>Signed:</b> | T Cuss |
|--------------|---------|----------------|--------|