

**Response to Consultee Comments on the Discharge of Condition Application Reference:  
250213 pursuant to Planning Permission Reference: 192928.**

**Construction of the South Wokingham Distributor Road ('SWDR') at Land South of  
Wokingham, East of Finchampstead Road and West of Waterloo Road, Wokingham**

**Lanpro Project No: 4977**

**May 2025**

The purpose of this letter is to set out the Applicant's responses to comments received from the Council's Landscape and Ecology Officers and the Environment Agency's ('EA') in relation the Discharge of Condition Application submitted in January 2025, to re-discharge Conditions 12 (Landscape), 13 (Landscape and Ecological Management Plan ('LEMP')) and 15 (Biodiversity Net Gain ('BNG')) pursuant to planning permission reference 192928.

Meetings were held with the EA on 7<sup>th</sup> April 2025, and with the Council's Ecologist on 8<sup>th</sup> May 2025 to discuss their comments. During these meetings, a number design changes were agreed to address the points raised, as set out below.

Table 1 below sets out the Landscape Officer's comments in respect of Conditions 12, 13 and 15, together with the Applicant's response.

<b>Landscape Officer's Comment</b>	<b>Applicant's Response</b>
<b>Condition 12 - Landscape Specification</b>	
I presume all the ground works will be implemented by the principal road contractor, i.e provision of soil to form planting beds.	Comment noted.
Reference to Kent County Council in para 1.1.4 will need to be replaced with Wokingham Borough Council.	The Landscape Specification Document (May 2025) has been revised to incorporate reference to Wokingham Borough Council.
Section 2 will need to be updated as some of the description is now not correct relating to the design of the road. For example, the existing roundabout on Finchampstead Road is now not being increased in size.	The Landscape Specification Document (May 2025) has been revised to incorporate a revised description of the development.
For the Woodland Planting indicated in Table 1.5 the planting density is 1 plant per m <sup>2</sup> however this spacing is very close for woodland planting and recommend this is changed to 1 plant per 2m <sup>2</sup> . I also suggest this spacing is used for the Wet Woodland planting.	A similar comment was received from the Ecology Officer, who requested a less dense planting specification. Following a meeting with the Council's Ecologist, the Applicant was advised to adopt this approach, and the

	Landscape Specification Document (May 2025) has been updated accordingly.
Section 7.5 regarding weed control will also need to indicate how excessive pernicious or invasive weed growth outside the weed free area around each plant is dealt with in areas of new woodland or woodland edge type planting. This could involve strimming the whole area to keep control of the overall weed growth perhaps twice a year. This will need to be added to the document.	In addition to the revised planting density for the woodland areas, the specification now includes areas outside of the 'weed-free zone' to be overseeded with a diverse meadow mix suitable for the planting areas. This overseeding will provide added ecological and visual value until the woodland areas have established. These areas will be strimmed on an annual basis to control the flush of pernicious weeds.
Paragraph 8.1.1 on Implementation Timeframes will need to consider the phasing of the road. Some planting maybe achievable in the following planting season in areas where parts of the road have been completed. I suggest we shouldn't be waiting for the whole road to be completed before parts of the landscape scheme are implemented.	The landscape works can be implemented incrementally, in line with the completion of individual development phases. The phasing of the development is addressed under Condition 4.
It is important to note at this point that the landscape contract should not be linked to the practical completion of the main construction works for the road. This is because it is likely that the road will be completed at a point in the year which is outside the planting season and it is essential that no planting is undertaken during this timeframe, but only during October – March which is the planting season, otherwise it is likely that much of the planting will not survive.	Comment noted.

#### **Condition 12 – Landscape Drawings**

Drawing 3001 – One tree (Sau - Sorbus aucuparia) is shown in the same location as a lamp column adjacent to the new roundabout and will need to be moved to an alternative location. This is highlighted in orange below. (see image)	This comment has been taken into account and reflected in the latest landscape drawings.
Drawing 3002 – the Wet Woodland on the N-E embankment of the bridge crossing appears to be mislabelled as Low Woodland Edge Mix. This will need to be checked.	This comment has been taken into account and reflected in the latest landscape drawings.
Drawing 3002 – A street tree (Ccol - Corylus colurna), as indicated below, is shown to be located in a very narrow section of verge and is unlikely to do well due to its restricted rooting area plus the stem will be too close to the road. I suggest it is relocated elsewhere. (see image)	This comment has been taken into account and reflected in the latest landscape drawings.
Drawing 3005 – Additional replacement planting will need to be included along the section of Easthampstead Road south of the SWDR. The Tree Protection Plan now indicates more trees to be removed than originally anticipated. The extracts below show the trees to be removed and the areas where additional planting needs to be included, highlighted in orange. (see image)	This comment has been taken into account and reflected in the latest landscape drawings, with additional hedgerow included.
Drawing 3006 – On the northern side of the SWDR where adjacent to parcel R8 the landscape scheme indicates a hedgerow and hedgerow trees to the back of the footway. I'm wondering if this planting is viable as it may be affected	Following further discussions with consultees, it was agreed that these hedgerows will remain in place under the current proposals, due to the requirement to achieve the

<p>by the works for the development parcel including possibility of amending site levels so that housing better relates to the road. If this is likely to be the case, I suggest the planting is removed and we will consider planting in this location as part of the detailed layout plans for this particular parcel.</p>	<p>10% BNG. The presence of the hedgerows will be reviewed and managed as part of future applications.</p>
<p>Drawing 3007 – The same applies to the proposed hedgerow adjacent to parcel R13.</p>	<p>Following further discussions with consultees, it was agreed that these hedgerows will remain in place under the current proposals, due to the requirement to achieve the 10% BNG. The presence of the hedgerows will be reviewed and managed as part of future applications.</p>
<p>Several of the species proposed for the street tree planting may need to be further considered. Of the eight species considered, three are likely to have broader canopies than the space allows in relation to the road. (We have had a number of issues on other schemes where there have been concerns raised regarding ongoing maintenance issues to do with highway safety and encroachment of canopy into the road). The three trees in question are <i>Corylus colurna</i>, <i>Tilia cordata 'Greenspire'</i> and <i>Ulmus 'New Horizon'</i>. Other cultivars which have narrower crowns that should be considered as alternatives are:</p> <ul style="list-style-type: none"> <li>• <i>Corylus colurna</i> Treevolution 'UDB Obelisk'(2.3m wide)</li> <li>• <i>Tilia cordata</i> Rancho (6-9m wide)</li> <li>• <i>Tilia cordata</i> 'Streetwise'</li> <li>• <i>Ulmus columnella</i></li> <li>• <i>Ulmus 'New Horizon'</i> 'Rebona'</li> </ul>	<p>The intention of the tree planting along the spine road is to provide broad canopy cover for both ecological and landscape value. Therefore, some of the narrower-canopied species suggested as alternatives are not considered suitable for this location. However, the suggested use of <i>Tilia cordata 'Streetwise'</i> is appropriate, and the landscape proposals have been amended accordingly.</p>
<b>Condition 13</b>	
<p>Paragraph 6.2.12 will need to be more specific regarding watering of the larger specimen trees (street trees and those in the green spaces). In the Landscape Specification document it states in paragraph 7.3.2 – Large specimen trees will need to be watered twice a week during the first year (25 – 30 litres per visit) but more frequently during prolonged dry periods. Therefore the LEMP will need to also comply with this frequency of watering.</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p>
<p>Paragraph 6.2.26 regarding watering of hedgerow trees will also need to refer to a greater frequency of watering in line with point 1 above.</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p>
<p>Additional measures for weed control in areas of the various woodland mixes and shrub mixes will need to be included. The LEMP will need to indicate how excessive pernicious or invasive weed growth outside the weed free area around each plant, is dealt with. This could involve strimming the whole area to keep control of the overall weed growth perhaps twice a year.</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p> <p>In addition to the revised planting density for the woodland areas, the specification now includes areas outside of the 'weed-free zone' to be overseeded with a diverse meadow mix suitable for the planting areas. This overseeding will provide added ecological and visual value until the woodland areas have established. These areas will be strimmed on an annual basis to control the flush of pernicious weeds.</p>

<p>The frequency of weed control around trees, shrubs and along the hedgerows as indicated in the Management Schedule (6.3) will need to be greater than 1-2 times per annum, especially in the first 3 years. I would suggest this should be at least 4 times a year in order to control and manage weed growth which will inevitably compete with the plants we are trying to establish, for water and nutrients. The schedule will also need to include the additional weed control operation I have discussed in point 3 above.</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p>
<p>The landscape condition requires an annual landscape audit, and provision of this will need to be detailed in the LEMP.</p>	<p>The comments have been taken into account and an annual audit has been incorporated into the revised LEMP (May 2025).</p>

*Table 1: Response to the Landscape Officer's Comments*

Table 2 below sets out the EA's comments in respect of Conditions 12, 13 and 15, together with the Applicant's response.

Environment Agency's Comment	Applicant's Response
<b>Condition 12</b>	
<p>On the submitted diagrams, such as "Highways Riverbank Ecological Enhancements Sections Sheet 4" and "Highways Riverbank Ecological Enhancements Sections Sheet 6", the deepest points of the backwaters are in the main body of the features, beyond the inlet channel. The backwaters should be graded so the bed depth drops towards the bed of the main channel, the Emm brook. Currently, the shallower inlet channel risks isolating the backwater feature from the main channel during times of low flows, when levels fall below that of the main body of the backwater. In turn, this could result in fish becoming trapped in the backwater.</p> <p>Consequently, a considered, and graded design is needed to establish a secure and permanent interface between the main river and the backwater.</p>	<p>Backwater areas were discussed in meeting held 07/04/2025. The agreed changes to the features are:</p> <ul style="list-style-type: none"> <li>• Opening angled more upstream</li> <li>• Backwaters to have steeper inlets, to increase depth from the river channel more quickly to reduce the risk of cut off from the watercourse due to sedimentation.</li> <li>• Neighbouring backwaters and scrapes within the floodplain to be combined into single features to ensure connectivity to watercourse following flood events.</li> <li>• Wetland margins around backwaters to be of varying width and slope to encourage variety of vegetation and habitat.</li> <li>• Small scrape between the earthwork toe and the access path is to be increased in size, with varying depth, varying widths and depths of the surrounding bench.</li> </ul> <p>Full details of the backwaters and scrapes are set out in the supporting drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026.</p>
<p>Further, plans should include bank to bank cross sections, showing the full profile of the watercourse and associated backwater. For instance, "Section B-B" of the "Highways Riverbank Ecological Enhancements Sections Sheet 4" and "Section E-E" of the "Highways Riverbank Ecological Enhancements Sections Sheet 6", should extend to also cover the opposite bank of the Emm Brook.</p>	<p>Full details of the backwaters and scrapes are set out in the supporting drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026.</p>

<p>There should be variability in the depths and widths of the backwater shelves. Currently, plans such as "Highways Riverbank Ecological Enhancements Detailed Location Plan 1", "Highways Riverbank Ecological Enhancements Detailed Location Plan 2" And "Highways Riverbank Ecological Enhancements Detailed Location Plan 3" show a uniform 2-meter wide shelf with a 1 in 10 gradient to outline all the backwater features.</p>	<p>Full details of the backwaters and scrapes are set out in the supporting drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026.</p>
<p>The inlet channels of all the backwaters need to be reorientated to face downstream, joining at approximately 45 degrees to the river channel. As they are currently positioned (as shown on diagrams "Highways Riverbank Ecological Enhancements Detailed Location Plan 2" and "Highways Riverbank Ecological Enhancements Detailed Location Plan 3"), the mouths of the backwaters are inclined to the downstream extent, but this needs to be more apparent. Otherwise, the features will face greater erosion risks, being more exposed to the passing flows. Instead, with the inlet channels positioned more acutely towards the downstream extent, the design will support the features backfilling at a more sustainable rate from the main channel. This will also protect the natural flow dynamics of the Em brook.</p>	<p>Full details of the backwaters and scrapes are set out in the supporting drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026.</p>
<p>The scrape shown immediately to the north of the road bridge on diagram "Highways Riverbank Ecological Enhancements Detailed Location Plan Sheet 2 (April 22)" is too small to provide any ecologically functional habitat. We advise this is either made larger or the applicant provides justification for the features design (i.e., is it tied into the site's drainage network?)</p>	<p>Full details of the backwaters and scrapes are set out in the supporting drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026.</p>
<p>Although under separate legislation, the description for the linked Flood Risk Activity Permit refers to 3 connected scrapes (backwaters) but only two backwaters are visible on the diagrams submitted with this application, such as: "Highways Soft Landscaping Planting Plan Sheet 2" and "Highways Riverbank Eco Enhancements Sheet 1". It is therefore unclear as to how many of these features are planned.</p>	<p>Comment noted. Full details of the backwaters and scrapes are set out in the supporting drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026.</p>
<p>Further, due to the absence of the third backwater feature from any of the planning diagrams, we have no information for the proposed structure and layout. We will need this information to assess its suitability.</p>	<p>Full details of the backwaters and scrapes are set out in the supporting drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026.</p>
<p>It is unclear as to where any dog and wildlife fencing extends within the current proposal. This should be considered alongside the design and positioning of the backwaters. Currently, plans do not show fencing provisions alongside the backwaters and as such, we cannot assess whether these habitat features will be adequately protected from local threats such as dogs entering the backwaters. We request that the applicant</p>	<p>Following discussions with the Council's Ecologist, lengths of 'dead hedge' have been incorporated between the backwaters and public open space to deter dogs from accessing the backwaters, as a natural alternative to fencing.</p>

<p>provides a detailed plan to explain how the created habitat features are to be protected (i.e., via strategically planted hedgerow), and show the full extent of the fencing plan (dog proof fencing and wildlife fencing), alongside the backwaters.</p>	
<p>Finally, we would recommend that the applicant considers combining the scrape and backwater positioned to the southeast of the footbridge. Alone, these features are relatively small and will be limited in the habitat they can provide to local wildlife. However, combining them, could create one larger and more meaningful feature, whilst effectively requiring the same degree of ground works.</p>	<p>As previously noted backwater areas were discussed in meeting held 07/04/2025. The agreed actions have been taken into account and incorporated into the revised backwaters and scrapes details, as set out in the supporting drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026.</p>
<p>If feasible, this opportunity for the creation of larger features should also be investigated in the area of the northernmost backwaters (upstream of the road bridge). All features included in plans for ecological gain, should be designed in a way that best achieves this. We would be very happy to discuss backwater designs further with the applicant at a meeting. Please note that we are looking to arrange a meeting with the applicants' consultants to discuss a number of the elements we raise here that are included within a linked Flood Risk Activity Permit application. It would seem sensible to have a combined meeting with the applicant to discuss planning and environmental permitting matters together. It should be noted that on Highways Soft Landscaping Planting Plan Sheet 2 (drawing number WMHP-TG-SRWG1-DR-LS-3002 Rev P09), a 4 metre wide buffer for underground cables is shown; the proposed backwater to the north of the road appears to cut through this, as does one of the scrapes here. This could present a fundamental barrier to being able to construct these features here. Further clarification is required with regard to this.</p>	<p>As previously noted backwater areas were discussed in meeting held 07/04/2025. The agreed actions have been taken into account and incorporated into the revised backwaters and scrapes details, as set out in the supporting drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026.</p>
<p>Any proposed planting should use locally native species of UK genetic provenance.</p>	<p>The Landscape Specification Document (May 2025) has been revised to incorporate reference to the proposed planting where appropriate.</p>
<b>Condition 13</b>	
<p>1.1.5: This states that the eleven year post-construction management period will facilitate the safeguarding and enhancement of the site's ecological assets in the short to medium term. The long-term management of the SANGS habitat management is not considered within this document; however temporary measures are included. Long term habitat management will be incorporated within a 'management agreement' as part of this; when areas to be covered by Tony Gee are confirmed temporary management will be required until the residential developer, Persimmon, take over. Justification is required with regard to why the post-construction management period only covers 11 years. For BNG purposes it needs to</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p>

<p>be 30 years. Clarification is required with regard to when this LEMP commences; is it from the start of construction or from the end of construction?</p>	
<p>6.2.93: This states that any failed plug planting or seeding will be topped-up until sufficient planting densities have been achieved. If particular species are failing, suitable alternatives will be used in replacement. – Any alternatives must be locally native species of UK genetic provenance.</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p>
<p>6.2.94: This states that large deadwood habitats, created using site gained felled trees, will be installed within the backwaters to provide hydraulic variability and habitats for fish, amphibians, invertebrates, and perching sites for birds. The felled wood must be secured and pinned down. - These need to be good size, large trees, not willows. These also need to be positioned across at least 50% of the channel to be able to provide the ecological enhancements proposed. These features should be indicated on the appropriate plans.</p>	<p>Large deadwood habitat features have been removed from the scheme following further comments from consultees. Deadwood hedges have been introduced as a suitable alternative.</p>
<p>6.2.97: This states that the typical water level of the Emm Brook is 49.1mAOD. The connection between the backwaters and the Emm Brook is proposed to match the base level of the Emm Brook (~49.6mAOD). The average base of the proposed backwater habitats is 48.1mAOD (backwater south of the bridge) and 48.0mAOD (backwater north of the bridge). A slope, graded at 1 in 10 from the mouth to the deepest point of the backwater, feeds from the Emm brook into the habitats. - The backwaters cannot be deeper than the bed of the Emm Brook, because it will mean that when the river levels go down again, there could be pools formed in the deeper areas, which will leave fish stranded and unable to get back into the river. (See comments for Condition 12, above.)</p>	<p>A meeting was held with the EA on 07/04/2025 to discuss the backwaters, during which it was agreed that the backwaters can be made deeper.</p> <p>Full details of the backwaters and scrapes are set out in the supporting drawings WMHP-TG-SRWG1-DR-HI-3021 to 3026.</p>
<p>6.2.103: This states that the mouth of the backwaters must remain open and free from debris buildup to ensure water retention and access for wildlife, especially in low-flow conditions. Further information is required with regard to how this debris build up would be prevented or managed. (See comments for Condition 12, above regarding the angle that these backwater features should join the river channel).</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p>
<p>6.2.106: This states that the edge of the scrapes will be dropped down 0.1m from the existing ground level (approx. 50mAOD) into scrape margins (~2m wide) with a gradual slope (&lt;1 in 10) before dropping to an undulating base of no more than 1m depth (49.0mAOD). - Will this definitely hold water all year round? Has there been an analysis of the groundwater level and the soil type to make sure it will not be too free draining?</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p>
<p>6.2.108: This states that the realigned channels of the Luckley Brook and Emm Brook tributaries will incorporate</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p>

<p>low-level berms, forming a two-stage channel. The berms will promote channel sinuosity, provide habitat, and improve lateral connectivity. The berms will form floodplain benches, flooding during the mean annual flood flow and will support a range of water tolerant plant species. Further information is required regarding the level at which these berms would sit relative to mean summer water level. It is unclear whether these would have graduated levels or just be a step. Cross sections through the watercourses showing these details should be provided</p>	
<p>6.2.112: This states that the base of the banks should be monitored once a year in summer for undercutting. If erosion persists, additional erosion control measures, such as matting or stones, should be installed to protect the spiling. - The erosion control should be coir rolls/matting, or other natural methods such as rip rap. These are the options we would support, over other options such as Erosamat, which is being proposed to be used in a large amount as erosion control. Discussions have been held very recently with the developer's consultants regarding this matter and amendments to the drawing are expected which would remove the bulk of the currently proposed Erosamat from the development.</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p>
<p>6.2.121: This states that the management and/or eradication of invasive species will be a form of adaptive management as many habitats rely on either a lack, or low cover, of invasive species to achieve condition criteria. Different invasive species will require different management prescriptions and as such, appropriate management should be planned upon the identification of species. - There should also be the adherence to the Check, Clean, Dry procedure for any invasive species that are on site. It is not clear what invasive species may be on site, or indeed, if any surveys have been carried out. Please clarify.</p>	<p>The comments have been taken into account and incorporated into the revised LEMP (May 2025).</p>
<b>Condition 15</b>	
<p>This states that previous assessments used the Biodiversity Metric Version 2.0 and that the information contained within that had been converted to be used in Version 3.1. As this conversion appeared to have been carried out in September 2024, it may have been more appropriate to use the Statutory Biodiversity Metric (based on Version 4.0) which was in force at that time.</p>	<p>The use of metric 3.1 was recommended by Wokingham Borough Council. Version 3.1 was in use when originally submitted.</p> <p>Comment from WBC 'I am in agreement with the approach taken to convert the baseline information from metric 2.0 to metric 3.1 and to account for the watercourses on site.'</p>
<p>We do note that it is stated that they did use the Statutory Biodiversity Metric condition sheets for ditch condition and that they did carry out a River Condition Assessment for the Emm Brook 'enhancement' and the redirected Luckley Brook and Emm Brook tributaries, but the narrative around this is somewhat lacking. Paragraph 2.4.15 states that "the original WFD Assessment completed by WSP was</p>	<p>Paragraph 2.4.15 is explaining that WSP did the conversion to MoRPh and assigned the baseline score as moderate (see paragraph 2.1.3). Lanpro and WBC assessed this baseline and reduced it to 'Fairly Poor' due to over deepening, in line with the River MoRPh methodology (see Paragraph 2.4.15). This baseline was applied to all watercourses on-Site. A desk-based post-development scenario was run by Lanpro using the MORPH Methodology</p>

<p>converted to MoRPh and the Emm Brook was assigned a condition score of moderate. No score was given to the Emm Brook tributaries or Luckley Brook.” No explanation is given for this. Paragraph 2.4.8 states that there is a discrepancy between the areas covered in previous baseline assessments, with one covering only the spine road’s red line boundary and another including all temporary works. While this report covers only the permanent road works as per the final designs from December 2024, it may be more appropriate to include the haul road and other temporary works.</p>	<p>for the Emm Brook enhancement and the redirected Luckley brook and Emm Brook. The predicted results were input into Cartographer.io to calculate the post-development river condition (see paragraph 2.3.3).</p> <p>Paragraph 2.4.8 Refers to baselines completed in relation to other developments. As explained in paragraph 2.4.17: It is assumed that habitats temporarily lost due to the construction of the proposed Haul Road would be restored to their original habitat type by the road contractor. Therefore, these habitats will not be included in this updated calculation as the haul road will fall in the remit of proposed future developments as above, and the baseline information has already been mapped by others. This assumption excludes any individual trees or hedgerows that will be recorded as permanently lost. Therefore, some hedgerow removal extends outside the post-development boundary.</p> <p>This approach was agreed by Wokingham Borough Council.</p>
<p>With regard to Table 5: Baseline Habitat Units, it would be helpful to have an accompanying map showing the location of the various sections of watercourse referred to in the table.</p>	<p>This comment has been taken into consideration, and an accompanying map has been produced (4977_SWDR_Baseline Watercourse ID Map).</p>
<p>On page 12 in Table 1: Interpretation of Proposed Soft Landscaping, with regard to the backwaters, it is stated that these are included within the watercourse module. Backwaters are, however, listed as ‘other neutral grassland’ in Table 6:Area Habitat Creation on page 21 and given 0.21 habitat units. Clarification is required to ensure that these are not double counted.</p>	<p>This comment has been taken into account, and the BNG Report (May 2025) and the BNG Metric have been updated.</p>
<p>In Table 8: Watercourse Enhancement, it is not clear how the uplift in river units is being achieved. Further details are required with regard to how these watercourses are proposed to be enhanced.</p>	<p>This comment has been taken into account, and the watercourses have been separated and a justification column has been added to Table 2 of the BNG Report (May 2025).</p>
<p>In Table 9: Watercourse Creation, a number of culverts are listed under watercourses being created. Culverts have little to no value in terms of biodiversity.</p>	<p>While it is acknowledged that they have limited ecological value, they are nonetheless included as an option within the metric. Omitting them due to their poor quality would misrepresent the baseline conditions.</p>
<p>Under tab C-2 Site River Creation, we remain to be convinced that these sections of watercourse would achieve moderate condition. No details have been provided to show the design and cross sections of these sections of channel, but the landscape plans (drawings numbers WMHP-TG-SRWG1-DR-LS-3001 Rev P09 to 3009 Rev 09) appear to show all created channels as being trapezoidal channels with no ecological features. Likewise, under tab C-3 Site River Enhancement, it is not clear how a movement from Fairly Poor to Moderate would be achieved. Clarification and further details are required.</p>	<p>This comment has been taken into account, and the watercourses have been separated and a justification column has been added to Table 2 of the BNG Report (May 2025).</p>

Table 2: Response to the EA's Comments

Table 3 below sets out the Ecology Officer's comments in respect of Conditions 12, 13 and 15, together with the Applicant's response.

Environment Agency's Comment	Applicant's Response
<b>Condition 12</b>	
<p>Plans WMHP-TG-SRWG1-DR-LS-3008 P09 and WMHP-TG-SRWG1-DR-LS-3009 P09 cover the attenuation basin which will eventually be in Holme Park SANG. The bottom of this basin should be undulating creating several ponds via 'over-digging'. This is currently proposed as Rain Garden/Wetland Mix Type 2 (Emorsgate EM8+) with the plus referring to supplementary plug planting listed. The supplementary plug planting mix needs to include the following additional species:</p> <ul style="list-style-type: none"> <li>• Angelica sylvestris</li> <li>• Mentha aquatica</li> <li>• Phragmites australis</li> </ul>	<p>The comments have been taken into account and incorporated into the Landscape Specification Document (May 2025).</p>
<p>Plan WMHP-TG-SRWG1-DR-LS-3002 P09 currently includes two timber habitat structures shown as points near the proposed backwaters. These should be redesigned as linear dead hedge structures between the pedestrian paths and the backwaters/scrapes. That way they will provide a degree of protection from disturbance without preventing ecological permeability for wildlife.</p>	<p>Following a review of several comments regarding the timber habitat structures, these have been removed from the scheme and replaced with dead hedges to provide a multifunctional feature.</p>
<p>Within the Landscape Specification, the specification of spiral guards or shrub shelters for all whips, transplants, and shrub plants is not acceptable for the Woodland Planting mix and Wet Woodland Planting mix. Without more substantial protection, these trees are highly likely to fail. Planting at 1 per 1m<sup>2</sup> is very dense planting for woodland creation. Our experience on other road schemes is that there is better establishment with a lower density planting (e.g. 1 per 4m<sup>2</sup> spacing) and 1.2m tree tubes used for protection and a focus on weeding in the first year. Given that the LEMP seeks 90% survival and the condition requirement is for all failures within the first five years to be replaced, approving spiral guards and dense planting is going to be costly in the long-run because of the likely high failure rate. I recommend that the planting density is reduced and better protection measures are specified in this document.</p>	<p>The planting density has been reduced in response to comments received. Due to the limited canopy cover in the early years, a supplementary seed mix has been added to provide ground cover until the woodland canopy becomes established.</p>
<b>Condition 13</b>	
<p>The LEMP needs to include a long-term objective for the delivery of an overall biodiversity net gain with reference to the approved BNG metric and strategy. This needs to set out the requirement for management for a minimum of 30 years – although it is acceptable that detailed prescriptions</p>	<p>The comments have been considered, and the LEMP has been updated to include a BNG section outlining the need for adaptive management to secure habitats for a period of 30 years.</p>

<p>might be for a shorter period of 5-10 years on the basis that a management plan review is built into the actions so the detail for the remaining years can be resolved in due course, including the potential to adapt management where monitoring identifies a need in order to meet BNG objectives.</p>	
<p>The LEMP needs to identify the key condition criteria that the various habitats need to pass in order to achieve the condition scores proposed for the post-development scenario in the BNG strategy. In doing this, specific actions relevant to delivering the required BNG condition scores need to be listed.</p>	<p>This has been included within the BNG Report and cross-referenced in the LEMP.</p>
<p>The LEMP should identify indicators of success for the various habitats (e.g. target botanical species that should be within the various habitat parcels – where reference to recognisable NVC species is made for woodland ground flora, the target species should be listed).</p>	<p>Indicators of success are based on the condition criteria outlined in Table 1 of the BNG Report. The table assesses whether the specified species mixes are appropriate for achieving the required condition criteria.</p>
<p>The LEMP needs to identify constraints on site (e.g. underground cables; main rivers; key features to be managed for protected species) relevant to ongoing management, with links/signposts to further information.</p>	<p>Comment noted.</p>
<p>Section 4 covers management responsibilities. Paragraph 4.1.2 states that the local highway authority will be responsible for maintenance of all landscape after the initial five year maintenance period. I'm not convinced that it is as simple as this. Please can the LEMP confirm what is happening to areas that form part of the development parcels for South Wokingham SDL – as in, is there a period where ownership and management responsibility may fall to developers before being finally adopted by the Council? It would be helpful if these locations could be identified in a plan within the LEMP.</p>	<p>The reference to the highways authority as the sole party responsible for maintenance has been revised. The updated text now clarifies that maintenance responsibilities will be distributed among various teams within Wokingham Borough Council.</p>
<b>Condition 15</b>	
<p>I have reviewed the submitted biodiversity metric (version: 3.1, assessor: Ben Wagstaffe, assessment date: 22 Jan 2025) and the accompanying Biodiversity Net Gain Report (Lanpro, revision: V2.0, 29 Jan 2025). I am in agreement with the approach taken to convert the baseline information from metric 2.0 to metric 3.1 and to account for the watercourses on site. I note that line 9 of tab C-1 appears to show a stretch of the Emm Brook being lost (where only part of the length is enhanced). Is this correct? Shouldn't the remainder not enhanced be shown as retained</p>	<p>A comment has been added in the BNG metric to highlight that a section of the watercourse is being culverted.</p>
<p>Backwater – Where this is shown in the landscaping plan as open water (i.e. the deeper parts which are not planted with herbaceous riparian mix), I think it is reasonable to count the area as 'Lakes – Temporary lakes, ponds and pools'. I would accept that moderate condition could be achieved.</p>	<p>This comment has been taken into account, and the BNG Report (May 2025) and the BNG Metric have been updated.</p>

<p>Backwater – Where this is shown in the landscaping plan as marginal shelf planted with herbaceous riparian mix, I think it is reasonable to count the area as ‘Wetland – Reedbeds’ because I think it will be the equivalent of Phase 1 marginal and inundation vegetation which the translation tool recommends classifying as reedbed. I would accept that moderate condition could be achieved.</p>	<p>This comment has been taken into account, and the BNG Report (May 2025) and the BNG Metric have been updated.</p>
<p>Scrapes – As these are likely to be incorporated into the Backwaters, see above</p>	<p>This comment has been taken into account, and the BNG Report (May 2025) and the BNG Metric have been updated.</p>
<p>Looking at Table 2 – River MoRPh Assessment of the Proposed Watercourse Creation and Enhancement, I am not sure I understand how the category scores were derived when considering the design proposed.</p> <ul style="list-style-type: none"> <li>• Why is ‘B2: Bank top tree feature richness’ a zero score when trees are being planted to create wet woodland in parts of the river corridor?</li> <li>• Why is ‘B5: Bank top managed ground cover’ scoring so strongly negative?</li> <li>• Why is ‘C8: Bank face reinforcement extent’ scoring so strongly negative?</li> <li>• Why is ‘E8: Channel bed reinforcement extent’ scoring so strongly negative?</li> </ul> <p>If these figures could be checked and explained in a bit more detail – particularly in relation to the Diverted Luckley Brook and Emm Brook Tributaries where the table shows a score that cannot translate to Moderate condition – that would be most helpful at providing confidence in the proposals.</p>	<p>This comment has been taken into account, and the watercourses have been separated and a justification column has been added to Table 2 of the BNG Report (May 2025).</p>
<p>Looking at Table 6 – Area Habitat Creation (also metric tab A-2, line 7), I recommend that the rain garden/wetland mix type 2 (if adjusted to include the species mentioned above in relation to condition 12) would be better identified as ‘Wetland – Reedbeds’ in moderate condition with a LEMP objective to manage for its inundation and reedbed interest. Whilst this results in a reduction of the number of units generated compared to categorising as ‘Grassland – Other neutral grassland’, I think it is more accurate for the hydraulic regime it will experience. On the basis of this habitat being created, I would also be able to recommend that, even though there is a trading rules deficit for the category ‘Woodland and forest – Wet woodland’ the local authority should accept the greater number of high distinctiveness wetland units as being acceptable compensation.</p>	<p>A comment has been added in the BNG metric to highlight that a section of the watercourse is being culverted.</p>
<p>Looking at Table 9 – Watercourse Creation (also metric tab C-2, line 12), I am not convinced that this should include the length of the backwaters as river creation as the area is already being counted within Table 6 – Area Habitat Creation (and the habitat creation tab A-2). A case needs to be made as to how this is river creation and not just</p>	<p>This comment has been taken into account, and the BNG Report (May 2025) and the BNG Metric have been updated. Backwaters have been removed from the watercourse section.</p>

recognised as condition enhancement within the rivers assessment.	
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We trust that the above, along with the submitted amendments, appropriately addresses the Council's Landscape and Ecology Officers and the Environment Agency's ('EA') comments. Should you have any further queries or require any additional information, please do not hesitate to get in touch.

Yours Sincerely



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