

Biodiversity Net Gain Objectives

**Ye Olde Leathern Bottel,
Barkham Road, Wokingham**

October 2024

Ecology | Green Space | Community | GIS

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EXECUTIVE SUMMARY

- 1.1 This report provides an assessment of the biodiversity change at Ye Old Leathern Bottel Pub, Barkham Road, Wokingham.
- 1.2 The baseline habitats include modified grassland, other neutral grassland, ruderal/ephemeral, developed land, sealed surface, introduced shrub, individual trees and hedgerows, equating to 2.83 area biodiversity units and 1.01 linear biodiversity units.
- 1.3 Proposals include modified grassland, other neutral grassland, developed land, sealed surface, individual trees and hedgerows which project an overall biodiversity net gain of 0.57 units (20.11%) for area habitats and 0.25 (25.07%) for linear habitats.
- 1.4 The project demonstrates an overall biodiversity net gain for area and linear habitats and meets the 10% net gain statutory minimum requirements. Detailed habitat management information will be included as part of habitat management and monitoring plan (HMMP).

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1 INTRODUCTION

- 1.1 This report provides an assessment of the biodiversity change following the proposals for the site at Ye Old Leathern Bottel Pub, Barkham Road, Wokingham, referred to as the 'site' and shown in Figure 1.
- 1.2 The site is located within Borough of Wokingham in Berkshire Local Planning Authority (LPA) and the Thames Valley National Character Area (NCA), close to the border of the Thames Basin Heaths NCA.
- 1.3 This report is submitted alongside the Statutory BNG Metric and plans showing the baseline and post-intervention habitats. Together, this is used to inform the planning process. A Biodiversity Net Gain Plan and Habitat Management and Monitoring Plan (HMMP) will be provided to secure the BNG planning condition for this project within the reserved matter stage of the planning process.



Figure 1 Site location

2 REPORT OBJECTIVES

2.1.1 The objectives of this BNG report are as follows:

- Establish the total number of baseline Area Habitat Units (AHU) and Linear Biodiversity Units (LBU) within the site.
- Establish the total number of AHU and LBU which will be retained, enhanced, and created under the current development design.
- Determine whether the proposed development will result in a quantitative net loss, no net loss or a net gain of biodiversity on site.
- Determine whether the proposed development achieves a scheme-wide net gain for biodiversity by evidencing compliance with the good practice principles.

2.2 Biodiversity Net Gain (BNG) Assessment

2.2.1 This BNG assessment uses the following industry recognised best practice methods:

- CIEEM, IEMA & CIRIA (2016). Biodiversity Net Gain: Good Practice Principles for Development.
- DEFRA (2023) The Statutory Biodiversity Metric.
- CIEEM (2021). Biodiversity Net Gain Report & Audit Templates.

2.2.2 The quantitative outcomes of the calculations are one component of the BNG assessment and associated good practice principles. A BNG assessment also requires the collation of qualitative evidence on the application of the mitigation hierarchy, stakeholder engagement and post-development habitat management. Collectively, these quantitative outcomes and qualitative evidence are used to inform the outcomes of the project wide BNG assessment.

2.3 Legislation

2.3.1 The relevant primary legislation for the statutory framework for biodiversity net gain is principally set out under Section 90A and Schedule 7A (Biodiversity Gain in England) of the Town and Country Planning Act 1990. This legislation was inserted into the Act by Schedule 14 of the Environment Act 2021 and includes amendments made by the Levelling Up and Regeneration Act 2023 and the Biodiversity Gain (Town and Country Planning) (Consequential Amendments) Regulations (2024). The relevant biodiversity net gain regulations most directly relevant to planning are:

- The Environment Act 2021 (Commencement No. 8 and Transitional Provisions) Regulations (2024) which commence biodiversity net gain for most types of new planning applications and provides transitional arrangements for Section 73 permissions.
- The Biodiversity Gain Requirements (Exemptions) Regulations (2024) which prescribe exemptions for categories of development to which biodiversity net gain does not apply.

- The Biodiversity Gain (Town and Country Planning) (Modifications and Amendments) (England) Regulations (2024) which amend the Town and Country Planning (Development Management Procedure) (England) Order 2015 and the Town and Country Planning (Section 62A Applications) (Procedure and Consequential Amendments) Order 2013 to include provisions related to planning applications and the Biodiversity Gain Plan, as well as modifications for phased development.
- The Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations (2024) which set out the modifications for irreplaceable habitat.

2.4 BNG Hierarchy

2.4.1 The biodiversity gain hierarchy for the purpose of the statutory framework for BNG is set out in Article 30A of the Development Management Procedure Order. This hierarchy is separate to the general mitigation hierarchy set out within the NPFF and is set out below:

- Avoiding adverse effects of the development on on-site habitat with a habitat distinctiveness score, applied in the biodiversity metric, equal to or higher than six.
- So far as those adverse effects cannot be avoided, mitigating those effects.
- So far as those adverse effects cannot be mitigated, habitat enhancement of on-site habitat.
- So far as there cannot be that enhancement, creation of on-site habitat.
- So far as there cannot be that creation, the availability of registered off-site biodiversity gain.
- So far as that offsite habitat enhancement cannot be secured, purchasing biodiversity credits.

3 METHODOLOGY

3.1 Desktop Survey

- 3.1.1 The LPA and NCA have been identified within this assessment. This is displayed within the desktop survey section of this report in Figure 2.
- 3.1.2 A search was undertaken using publicly available information for priority habitats using the Natural England Priority Habitat Inventory.
- 3.1.3 A search using publicly available information was undertaken to identify any irreplaceable habitats which are within or in proximity to the site. This included a search for Ancient Semi Natural Woodland (ASNW) and Ancient Trees using the Ancient Tree Inventory (ATI) online layer.
- 3.1.4 The desktop survey included a search for local plans, wildlife strategies, or local policy which may inform strategic significance of the habitats within this assessment. If habitats within the project are identified within a plan and are in the correct spatial location, they will be entered as being of high significance within this assessment. Habitats which are identified within a plan but fall outside of the spatial location or which are well-suited to the area will be assigned as being of moderate strategic significance. Other habitats will be entered as being of low strategic significance. The following strategies were used to inform the strategic significance of the habitats within this project:
- Priority habitats; and
 - Wokingham Borough Local Development Framework, Adopted Core Strategy Development Plan Document.

3.2 UK Habitat Classification Survey

- 3.2.1 The habitat survey was carried out on 29th May 2024 according to the UKHab Classification system. The survey included a detailed assessment of the land within the development boundary, including a description and mapping of all key features and habitat types. The survey was carried out to identify the range of habitats within the site and the predominant and notable species of flora.
- 3.2.2 Full results of the UKHab including species lists are provided within the corresponding EclA (Ecological Impact Assessment, Ye Olde Leathern Bottel, Barkham Road, Wokingham, July 2024).

3.3 Condition Assessments

- 3.3.1 Condition assessments were undertaken for each habitat which require condition assessment sheets. Assessments followed the methodology and criteria provided within The Statutory Biodiversity Metric – Technical Annex 1: Condition Assessments Sheets and Methodology (2023).

3.4 Grassland Survey Methodology

- 3.4.1 Grasslands were surveyed using a systematic approach, using 1x1m² quadrats sample. A minimum of three quadrats were undertaken of each grassland section. However, this can be increased to take into account variation across the grassland or the extent of the field. Information collected within each quadrat included average ground cover, sward variation, species, and their percentage cover.
- 3.4.2 Where the grassland differed to a certain extent or was divided by field boundary such as hedgerows, it was considered that the grassland was a different habitat parcel, and another assessment was undertaken.
- 3.4.3 This survey methodology provides information required to classify the grassland to the correct grassland habitat type and provides sufficient information to undertake a metric 4.0 condition assessment.

3.5 Hedgerows

- 3.5.1 Species-richness is determined using the methodology for species-richness within the Hedgerow Regulations Act 1997.

3.6 Limitations and Assumptions

- 3.6.1 Habitat surveys were carried out at a suitable time of year, but surveys were not exhaustive and may not have recorded all species present on site.
- 3.6.2 Habitat areas (ha) and lengths (km) produced in GIS were rounded to two and three decimal places (respectively) for inputting into the metric. Due to rounding of values there may be discrepancies in the total area of lost and created habitats within the metric. This is not considered a limitation to this BNG assessment as all habitats are considered to be captured accurately in GIS for representation in the BNG assessment.

4 DESKTOP SURVEY

4.1 Site Context

- 4.1.1 The site is located within Berkshire LPA and the Thames Valley NCA, as shown in Figure 2.

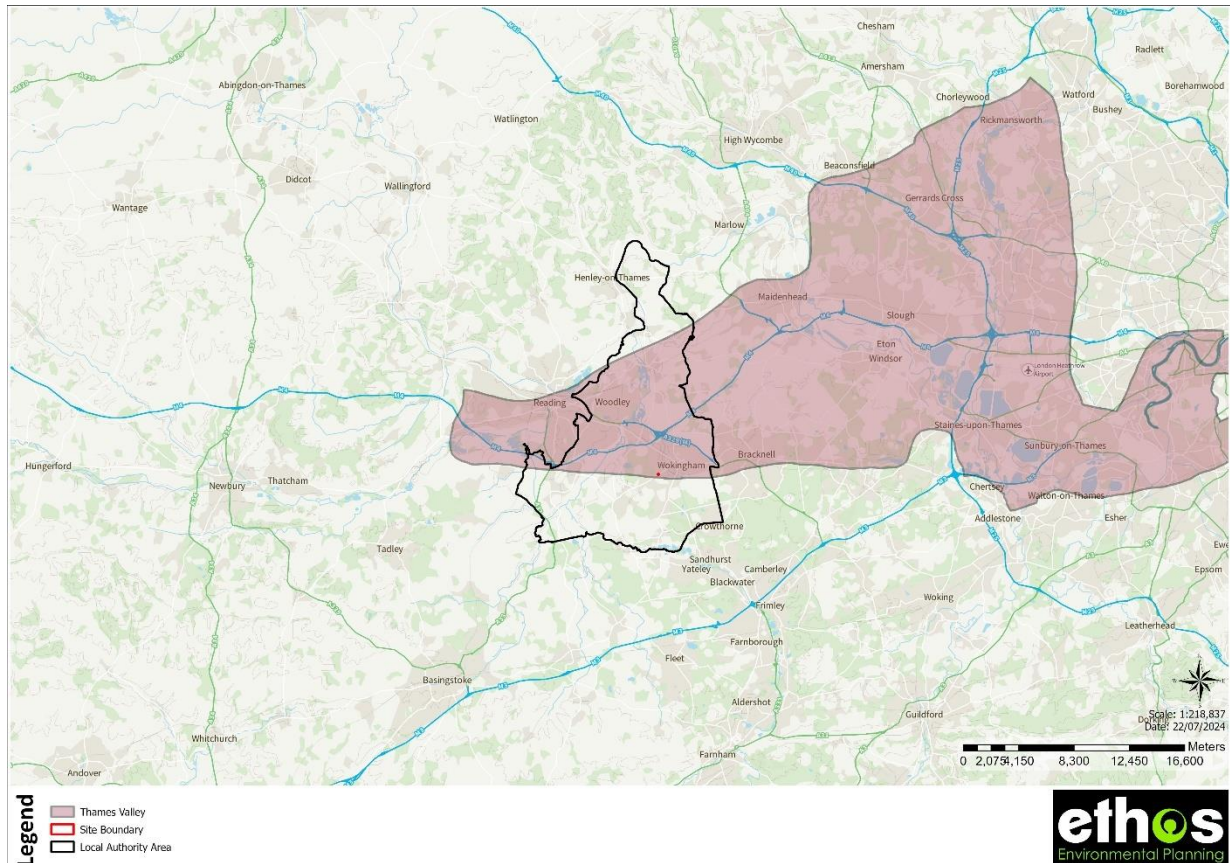


Figure 2 LPA and NCA

4.2 Strategic Areas and Priority/ Irreplaceable Habitats

- 4.2.1 This site is not located within any strategic area and as such, all of the habitats within this assessment have been input as being of a low strategic significance.
- 4.2.2 The site is located adjacent to deciduous woodland priority habitats. There are no priority habitats within the site boundary. It is considered that the site proposals will not result in an impact on the adjacent woodland and as such, priority habitats will not be impacted by the development.
- 4.2.3 A desktop search using publicly available information did not identify any irreplaceable habitats onsite. This was confirmed during the UKHab survey.

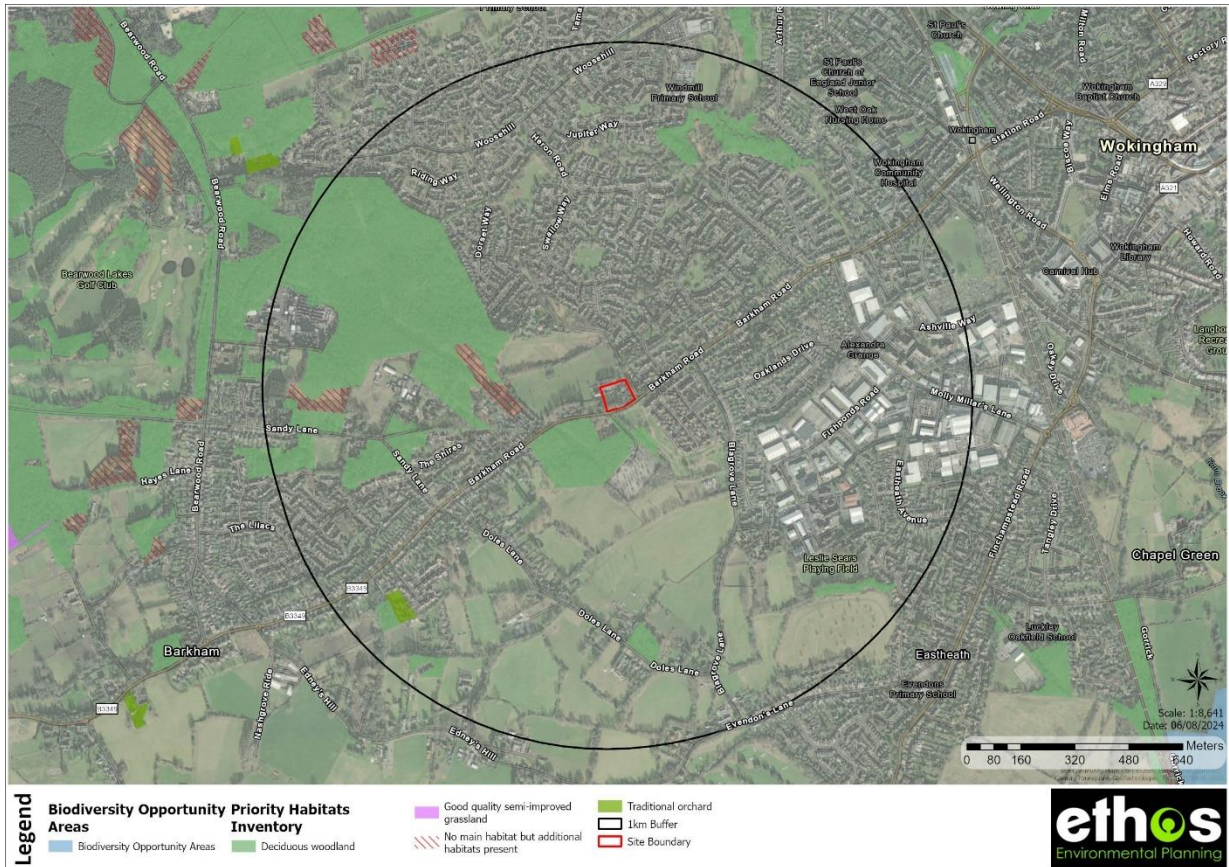


Figure 3 Priority habitats inventory map

5 BASELINE HABITATS

5.1.1 The site encompasses 0.61 hectares. The baseline map displays the existing habitats onsite (Figure 4) and the habitats are listed below. Conditions sheets for the baseline habitats are provided within Appendix 2 of this report. There are no irreplaceable habitats on site.

- Grassland – Modified grassland.
- Grassland – Other neutral grassland.
- Sparsely vegetated land – Ruderal/ephemeral.
- Urban – Developed land; sealed surface.
- Urban – Introduced shrub.
- Hedgerows – Native hedgerow with trees.
- Hedgerows – Ornamental non-native.
- Individual Tree – Urban tree.



Figure 4 Baseline Habitats

5.2 Area Biodiversity Units

Modified grassland (A1)

- 5.2.1 The site contains 1350m² of modified grassland dominated by Yorkshire fog, white clover and perennial ryegrass, as shown in Photos 1 and 2. This grassland is a low distinctiveness habitat.
- 5.2.2 This habitat is in a moderate condition. It is in this condition because it is a single-sward grassland of low species diversity. See Appendix 2 for condition assessment results.



Photo 1 Modified grassland



Photo 2 Modified grassland

Other neutral grassland (A2)

- 5.2.3 The site contains 280m² of other neutral grassland dominated by annual meadow grass, white clover and Yorkshire fog, as shown in Photo 3. The grassland is a medium distinctiveness habitat.
- 5.2.4 The habitat is in moderate condition. It is in this condition as is a good representation of the habitat, and has no damage seen. See Appendix 2 for condition assessment results.



Photo 3 Other neutral grassland

Ruderal/Ephemeral (A3)

- 5.2.5 The site contains 210m² of ruderal habitat that is comprised of bramble, cleavers, creeping buttercup, common nettle and dock, as shown in Photos 4 and 5. The habitat is of low distinctiveness.
- 5.2.6 The habitat is in moderate condition. It is in this condition as the vegetation structure is not varied and includes a range of undesirable species. See Appendix 2 for condition assessment results.



Photo 4 Ruderal vegetation



Photo 5 Ruderal vegetation

Developed land, sealed surface (A4)

- 5.2.7 The site contains 2820m² of developed land sealed surface in the form of a pub, car park and access road, as shown in Photos 6, 7, 8 and 9. The habitat is of very low distinctiveness. The habitat does not require a condition assessment.



Photo 6 Developed land, sealed surface



Photo 7 Developed land, sealed surface



Photo 8 Developed land, sealed surface



Photo 9 Developed land, sealed surface

Introduced shrub (A5)

- 5.2.8 The site contains 1510m² of introduced shrub, dominated by laurel, privet, cotoneaster and sycamore, as shown in Photos 10, 11, 12 and 13. The habitat is of low distinctiveness. The habitat does not require a condition assessment.



Photo 10 Ornamental shrub



Photo 11 Ornamental shrub



Photo 12 Ornamental shrub



Photo 13 Ornamental shrub

Urban tree

- 5.2.9 There are twelve mature trees present on site: ash, London Plane, cherry, oak, maple and a yew tree, shown in Photos 14, 15, 16 and 17. The habitat is of medium distinctiveness.
- 5.2.10 The trees are in moderate condition as they oversail vegetation and are native.
- 5.2.11 One mature pedunculate oak tree in the south west corner of the site (T3) on arboricultural survey, has been classified as a veteran tree by the Woodland Trust Ancient Tree Inventory.



Photo 14 Trees on site



Photo 15 Trees on site



Photo 16 Trees on site

5.3 Linear Biodiversity Units

5.3.1 There are three hedgerows and one line of trees on site, which are described below in Table 2.

Table 1 Linear Biodiversity Units on site

Number	Type	Distinctiveness	Condition	Photo
H1	Ornamental, non-native	Very Low	N/A	

H2	Ornamental, non-native	Very Low	N/A	
H3	Native hedgerow with trees	Medium	Good	

6 PROPOSALS

- 6.1 Development proposals comprise of the creation of a new road with pedestrian access. Along with alterations to existing car parking facilities and landscaping, as shown in Figure 5.



Figure 5 Development proposals (August 2024, Pegasus Group)

7 POST-INTERVENTION HABITATS

7.1.1 Condition assessment sheets for created and enhanced habitats are provided within Appendix 3 of this report. The proposed condition assessments include justification for how the habitats will meet their target conditions.



Figure 6 Proposed Habitats

7.2 Lost Area Biodiversity Units

Ruderal/Ephemeral (A3)

7.2.1 All existing areas of ruderal/ephemeral habitat will be lost to facilitate the development.

Developed land, sealed surface (A4)

7.2.2 A small area of developed land, sealed surface will be removed to facilitate the development.

Modified grassland (A1)

7.2.3 Some of the area of modified grassland will be removed to facilitate the development.

Introduced shrub (A5)

- 7.2.4 Some of the area of existing introduced shrub will be lost to facilitate the development.

7.3 Retained Area Biodiversity Units

Individual tree – Urban tree

- 7.3.1 All existing individual trees, including the veteran tree, will be retained in the proposed development.

Introduced shrub (A5)

- 7.3.2 Some of the area of existing introduced shrub will be retained in the development proposals.

7.4 Created Area Biodiversity Units

Developed land, sealed surface (A4)

- 7.4.1 Areas of developed land, sealed surface will be created on site, comprising access roads and pedestrian walkways. This habitat is not assigned a condition score, is a very low distinctiveness habitat and is of low strategic value.

Other neutral grassland (A6)

- 7.4.2 Areas of neutral grassland will be created on site, comprising amenity grassland areas around the existing and proposed structures. This habitat is a medium distinctiveness habitat that will be managed to achieve a moderate condition.

Ground level planters (A8)

- 7.4.3 Areas of ground level planters will be created on site, adding amenity value around the existing and proposed structures. This habitat is a low distinctiveness habitat that will need to be assessed to determine their condition.

Urban tree

- 7.4.4 There are 15 trees proposed to be planted within the plan. This habitat is of medium distinctiveness and will be managed to achieve a moderate condition.

7.5 Enhanced Biodiversity Units

Other neutral grassland (A6)

- 7.5.1 Much of the existing modified grassland that will be enhanced to other neutral grassland. This habitat is a medium distinctiveness habitat that will be managed to achieve a moderate condition.

Other neutral grassland (A7)

- 7.5.2 Some of the existing other neutral grassland and a small area of modified grassland is proposed to have its condition enhanced to good. This habitat is a medium distinctiveness habitat that will be managed to achieve a good condition.

7.6 Lost Linear Biodiversity Units

- 7.6.1 All hedges will be retained within the development proposal.

7.7 Retained Linear Biodiversity Units

H1, H2, H3

- 7.7.1 H1 and H2 are to be retained as part of the development proposed. As ornamental non-native hedgerows, they are of very low distinctiveness and have poor condition.
- 7.7.2 All of H3, a native hedgerow with trees will be retained as part of the development proposals. The habitat is of medium distinctiveness and is in good condition.

7.8 Created Linear Biodiversity Units

H5, H6, H7

- 7.8.1 All proposed hedgerows will be native hedgerows along the walkways and paths of the proposed development. The habitats will be of low distinctiveness, managed to be in a moderate condition.

8 SUMMARY OF BIODIVERSITY CHANGE

8.1 The habitat trading standards have been met within this project and the proposals result in a percentage gain of 20.11 for Area Base habitats and 25.07% for Linear habitats, as shown in Figure 7.

8.2 The current BNG position meets the 10% Net Gain objective.

FINAL RESULTS		
Total net unit change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	0.57
	Hedgerow units	0.25
	Watercourse units	0.00
Total net % change (Including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	20.11%
	Hedgerow units	25.07%
	Watercourse units	0.00%
Trading rules satisfied?	Yes ✓	

Figure 7 BNG headline results

9 BIODIVERSITY NET GAIN PRINCIPLES

9.1 This section sets out the ten BNG principles and how they have been considered throughout this project.

Table 2 BNG principles

PRINCIPLE	APPLICATION TO PROJECT
Principle 1: Apply the mitigation hierarchy	No habitats on site were assessed to be of importance for nature conservation (see EclA for further details). Therefore, avoiding impacts on the majority of habitats on site is not considered necessary. Important ecological features on site (native hedgerows, individual trees) will be protected during and post construction to mitigate any impacts as a result of the development. Overall, the proposals have been applied to the mitigation hierarchy and the site provides a biodiversity net gain. The development is assessed to be mostly compliant with the mitigation hierarchy.
Principle 2: Avoid losing biodiversity that cannot be offset by gains elsewhere	There is one tree that has been classified as veteran by the Woodland Trust Ancient Tree Inventory on site and this is being retained.
Principle 3: Be inclusive and equitable	Ethos have engaged with the architects for the project in order to identify the most suitable habitats for both biodiversity and aesthetic.
Principle 4: Address risk	All habitats to be created on site are low risk. Management and monitoring of habitats will be set out within a HMMP, with remedial measures identified if habitats are not meeting their target conditions.
Principle 5: Make a measurable net gain contribution	The site achieves a measurable gain beyond the 10% requirement.
Principle 6: Achieve the best outcomes for biodiversity.	As the site is losing grassland, the aim has been to replace grassland where possible and remove introduced shrub that is replaced with native hedgerows; although these are not direct links, the proposals create habitats that are beneficial for biodiversity and create an increase in native habitat across the site.
Principle 7: Be additional	The site is additional for area habitats as the targets are met and it goes over and above the required BNG for linear habitats, creating and enhancing habitats that are not currently on site and improving them, therefore being additional.

PRINCIPLE	APPLICATION TO PROJECT
Principle 8: Create a net gain legacy	The HMMP will set out management actions, monitoring plan and remedial measures which therefore plans for adaptive management and will secure dedicated funding for the 30-year management period.
Principle 9: Optimise sustainability	Other neutral grassland has been included within the proposals where feasible given the heavy foot traffic across the site along with hedgerows. This prioritises varied habitats within the small site area providing wider ecological benefits and a diverse site for users visually.
Principle 10: Be transparent	Draft BNG information has been provided throughout the project to the project team. This BNG report will be provided to the LPA as part of the planning application and will be available on the planning portal for comment. Therefore, it is considered transparent.

10 CONCLUSIONS

- 10.1 This project includes the creation of a new road with pedestrian access through the site. Additionally proposed within the Ye Olde Leathern Bottel pub site on Barkham Road, Wokingham is re-landscaping and alterations to the car park.
- 10.2 The proposals meet the trading requirements and provide more than a 10% gain in biodiversity for area habitats (20.11%). The site provides an >72% gain in linear habitats. This project mostly aligns with the BNG principles and is mostly in accordance with local and national policy, and emerging national legislation.
- 10.3 The project meets the BNG objective and can inform the BNG condition as part of the planning permission. A Biodiversity Net Gain Plan and HMMP must be submitted to the appropriate Local Authority within the reserved matters stage of this planning application to secure the BNG condition.

11 REFERENCES

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APPENDIX 1 POLICY AND LEGISLATION

11.1 Statutory Framework

- 11.1.1 Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.
- 11.1.2 In England, biodiversity net gain is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). This is referred to as biodiversity net gain in Planning Practice Guidance to distinguish it from other or more general biodiversity gains.
- 11.1.3 Under the statutory framework for biodiversity net gain, every grant of planning permission is deemed to have been granted subject to a general biodiversity gain condition to secure the biodiversity gain objective. This objective is to deliver at least a 10% increase in relation to the pre-development biodiversity value of the development granted permission. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.
- 11.1.4 The general biodiversity gain condition is a pre-commencement condition: once planning permission has been granted, a Biodiversity Gain Plan must be submitted and approved by the planning authority before commencement of the development. There are exemptions and transitional arrangements which disapply the condition from certain planning permissions, as well as special modifications for planning permissions for phased development and the treatment of irreplaceable habitats.
- 11.1.5 The statutory framework for biodiversity net gain also includes provisions about information requirements for planning applications and the treatment of the condition on planning decision notices.

11.2 Environment Act 2021

- 11.2.1 The Act requires a minimum of 10% net gain for biodiversity as a condition of planning permission.
- 11.2.2 Net gain is to be measured by the biodiversity metric published by the Secretary of State. The Act requires that gains must be secured for a minimum of 30 years post completion of development. Also, under Section 40 the NERC Act 2006, as amended by the Environment Act 2021, "A public authority which has any functions exercisable in relation to England must from time-to-time consider what action the authority can properly take, consistently with the proper exercise of its functions, to further the general biodiversity objective."...the biodiversity objective is, "...the conservation and enhancement of biodiversity in England through the exercise of functions in relation to England". This is referred to as the Biodiversity Duty.

- 11.2.3 The Environment Act received Royal Assent in November 2021, meaning that by February 2024 the expectation for all planning permissions to include a biodiversity net gain of at least 10% will become a legal requirement.

11.3 BNG Exemptions

Small sites (exempt until April 2024)

- residential development where the number of dwellings is between 1 and 9, or if this is unknown, the site area is less than 0.5 hectares.
- commercial development where floor space created is less than 1,000 square metres or total site area is less than 1 hectare.
- development that is not the winning and working of minerals or the use of land for mineral-working deposits.
- development that is not waste development.

Developments below threshold

- 11.3.1 A development that's below the threshold means that it does not impact a priority habitat and impacts less than:

- 25 square metres (5m by 5m) of habitat
- 5 metres of linear habitats such as hedgerows

Householder applications

- 11.3.2 These are applications made by householders as defined within article 2(1) of the Town and Country Planning (Development Management Procedure) (England) Order 2015. It includes, for example, small projects like home extensions, conservatories or loft conversions.

Self-build and custom applications

- 11.3.3 An exemption applies to this type of development when all the following conditions apply:

- it consists of no more than 9 dwellings.
- it's on a site that has an area no larger than 0.5 hectares.
- it consists exclusively of dwellings that are self-build or custom housebuilding as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015.

Biodiversity gain site

- 11.3.4 Developments undertaken for the purpose of fulfilling the BNG planning condition for another development are exempt.

High speed railway network

- 11.3.5 An exemption applies to any development forming part of, or ancillary to, the high-speed railway transport network, comprising connections between all or any of the places or parts of the transport network specified in section 1(2) of the High Speed Rail (Preparation) Act 2013.

11.4 National Planning Policy Framework

- 11.4.1 The National Planning Policy Framework (NPPF) sets out planning policy for England. Paragraphs of particular relevance from the NPPF are listed below:
- 11.4.2 Paragraph 180 states “Planning policies and decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”.
- 11.4.3 Paragraph 185 states “To protect and enhance biodiversity and geodiversity, plans should promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.”
- 11.4.4 Paragraph 186 states “When determining planning applications, local planning authorities should apply the following principles development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature where this is appropriate.”

11.5 UK Governments 25 Year Environment Plan

- 11.5.1 The UK Government’s 25 Year Environment Plan (DEFRA, 2018) states a desire to ‘embed a ‘net environmental gain’ principle for development to deliver environmental improvements locally and nationally’ and plans to consult on making Biodiversity Net Gain a mandatory requirement.
- 11.5.2 On 14th March 2019, Her Majesty’s Treasury confirmed that following consultation, the government will use the forthcoming Environment Bill to mandate BNG for development in England, ensuring that the delivery of much-needed infrastructure and housing is not at the expense of vital biodiversity.

11.6 Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem

- 11.6.1 A strategy for England's wildlife and ecosystem services (DEFRA, 2011) is the national strategy for biodiversity. This sets out an ambition to halt the loss of biodiversity and see an increase in the area of priority habitats by 200,000 ha by 2020. Biodiversity 2020 sets in policy the objectives to improve our wildlife Sites, make them bigger, develop more of them and join them up (summarised as 'Bigger, Better, More and Joined').

11.7 NERC Act

- 11.7.1 The Natural Environment and Rural Countryside (NERC) Act (HMSO, 2006) requires public bodies, including local authorities, 'to have regard to the conservation of biodiversity in England when carrying out their normal functions'. Section 40 sets out that:

- Paragraph 1. "Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity";
- Paragraph 3. "Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat".
- Section 41 sets out that: Paragraph 1. "The Secretary of State must... publish a list of the living organisms and types of habitat ... of principal importance for the purpose of conserving biodiversity" based on consultation with Natural England; and that Every planning authority must "a) take such steps... to further the conservation of the living organisms and types of habitat included in any list published under this section, or (b) promote the taking by others of such steps".

11.8 Local Policy

- 11.8.1 The relevant policies have been taken from The Wokingham Borough Council's Core Strategy (adopted 2010):

CP1 – Sustainable development

- 11.8.2 Planning permission will be granted for development proposals that:
- 1) Maintain or enhance the high quality of the environment;
 - 2) Minimise the emission of pollutants into the wider environment;
 - 3) Limit any adverse effects on water quality (including ground water);
 - 4) Ensure the provision of adequate drainage;
 - 5) Minimise the consumption and use of resources and provide for recycling;
 - 6) Incorporate facilities for recycling of water and waste to help reduce per capita water consumption;
 - 7) Avoid areas of best and most versatile agricultural land;
 - 8) Avoid areas where pollution (including noise) may impact upon the amenity of future occupiers;

- 9) Avoid increasing (and where possible reduce) risks of or from all forms of flooding (including from groundwater);
- 10) Provide attractive, functional, accessible, safe, secure and adaptable schemes;
- 11) Demonstrate how they support opportunities for reducing the need to travel, particularly by private car in line with CP6; and
- 12) Contribute towards the goal of reaching zero-carbon developments as soon as possible by:
 - a) Including appropriate on-site renewable energy features; and
 - b) Minimising energy and water consumption by measures including the use of appropriate layout and orientation, building form, design and construction, and design to take account of microclimate so as to minimise carbon dioxide emissions through giving careful consideration to how all aspects of development form.

CP7 – Biodiversity

- 11.8.3 Sites designated as of importance for nature conservation at an international or national level will be conserved and enhanced and inappropriate development will be resisted. The degree of protection given will be appropriate to the status of the site in terms of its international or national importance.

Development:

- A) Which may harm county designated sites (Local Wildlife Sites in Berkshire), whether directly or indirectly, or
- B) Which may harm habitats or, species of principle importance in England for nature conservation, veteran trees or features of the landscape that are of major importance for wild flora and fauna (including wildlife and river corridors), whether directly or indirectly, or
- C) That compromises the implementation of the national, regional, county and local biodiversity action plans will be only permitted if it has been clearly demonstrated that the need for the proposal outweighs the need to safeguard the nature conservation importance, that no alternative site that would result in less or no harm is available which will meet the need, and:
 - i) Mitigation measures can be put in place to prevent damaging impacts; or
 - ii) Appropriate compensation measures to offset the scale and kind of losses are provided.

APPENDIX 2 CONDITION ASSESSMENT SHEETS - BASELINE

Table 3 Grassland low (A1)

Condition Assessment Criteria	Evidence	Pass/Fail
There are 6-8 vascular plant species per m² present, including at least 2 forbs. Note - this criterion is essential for achieving Moderate or Good condition. Where the vascular plant species present are characteristic of medium, high, or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m² (excluding creeping thistle, spear thistle, curled dock broad-leaved dock, common nettle, creeping buttercup, greater plantain, white clover and cow parsley), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland, and then use the relevant condition sheet.	Average of 6 species when you exclude white clover and creeping buttercup	Pass
Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	All mown to a sward height of approx 3cm	Fail
Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	No scrub present	Pass
Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	No damage observed	Pass
Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Cover of bare ground approx 2%	Pass
Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	Cover of bare ground approx 2%	Pass
There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA).	No invasives present	Pass
Condition Assessment Result	Condition Assessment Score	Achieved
Passes <3 criteria or 4-6 criteria, excluding essential criterion A	Poor (1)	
Passes 4 or 5 criteria, including essential criterion A	Moderate (2)	

Condition Assessment Criteria	Evidence	Pass/Fail
<i>Passes 6 or 7 criteria, including essential criterion A</i>	<i>Good (3)</i>	Good (6)

Table 4 Other Grassland med high & V.high (A2)

Condition Assessment Criteria	Evidence	Pass/Fail
The parcel represents a good example of its habitat type, with a consistently high proportion of characteristic indicator species present relevant to the specific habitat type (and relative to Footnote 3 suboptimal species which may be listed in the UKHab description). Note - this criterion is essential for achieving Moderate or Good condition for non-acid grassland types only.	Grassland is varied with an average of 10 species, grasses and mixed forbs	Pass
Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	50% more than 7cm in height, varied sward minimal management	Pass
Cover of bare ground is between 1% and 5%, including localised areas, for example, rabbit warrens.	No bare ground.	Fail
Cover of bracken <i>Pteridium aquilinum</i> is less than 20% and cover of scrub (including bramble <i>Rubus fruticosus</i> agg.) is less than 5%.	None present	Pass
Combined cover of species indicative of suboptimal condition and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area. If any invasive non-native plant species (as listed on Schedule 9 of WCA) are present, this criterion is automatically failed.	No damage seen	Pass
Additional Criterion – must be assessed for all non-acid grassland types		
There are 10 or more vascular plant species per m ² present, including forbs that are characteristic of the habitat (creeping thistle, spear thistle, curled dock broad-leaved dock, common nettle, creeping buttercup, greater plantain, white clover and cow parsley are excluded from this count) Note - this criterion is essential for achieving Good condition for non-acid grassland types only.	Grassland is varied with an average of 10 species, grasses and mixed forbs	Pass
Condition Assessment Result	Condition Assessment Score	Achieved
<i>Non-Acid grassland types (/6)</i>		

Condition Assessment Criteria	Evidence	Pass/Fail
<i>Passes 2 or fewer criteria or Passes 3 or 4 criteria, excluding criteria A and F</i>		
<i>Passes 3 - 5 criteria, including essential criterion A</i>		<i>Moderate</i>
<i>Passes 5 or 6 criteria, including essential criterion A and additional criteria F</i>		

Table 9 Hedgerow (H3, retained)

Condition Assessment Criteria	Evidence	Pass / Fail
A1. Height >1.5 m average along length	Average 4-5m.	Pass
A2. Width >1.5 m average along length	Average 3m.	Pass
B1. Gap – Hedge base Gap between ground and base of canopy <0.5 m for >90% of length	Some areas of small gaps to ground and areas of more standard trees.	Fail
B2. Gaps – hedge canopy continuity Gaps make up <10% of total length; and No canopy gaps >5 m	No gaps.	Pass
C1. Undisturbed ground and perennial vegetation >1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: · Measured from outer edge of hedgerow; and · Is present on one side of the hedgerow (at least).	Grazed site side, gardens other side.	Pass
C2. Nutrient-enriched perennial vegetation Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground	Areas of stands of dense nettle and nettle throughout hedge.	Fail
D1. Invasive and neophyte species >90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of WCA) and recently introduced species.	None.	Pass
D2. Current damage	Managed on garden side but not damaged.	Pass

Condition Assessment Criteria	Evidence	Pass / Fail
>90% of the hedgerow or undisturbed ground is free of damage caused by human activities		
Additional group – Applicable to Hedgerows with trees only		
E1. Tree Class There is more than one age-class (or morphology) of tree present (for example: young, mature, veteran and or ancient), and there is on average at least one mature, ancient or veteran tree present per 20 - 50m of hedgerow.	Young and mature trees present.	Pass
E2. Tree health At least 95% of hedgerow trees are in a healthy condition (excluding veteran features valuable for wildlife). There is little or no evidence of an adverse impact on tree health by damage from livestock or wild animals, pests or diseases, or human activity.	Most healthy, a couple are standing deadwood or with dead sections.	Pass
Condition assessment results	Condition assessment score	Achieved
<i>Hedgerows with trees</i>		
<i>Fails a total of more than 5 attributes;</i> OR <i>Fails both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).</i>	<i>Poor (1)</i>	
<i>No more than 5 failures in total;</i> AND <i>Does not fail both attributes in more than one functional group (for example, fails attributes A1, A2, B1, C2 and E1 = Moderate condition).</i>	<i>Moderate (2)</i>	
<i>No more than 2 failures in total;</i> AND <i>No more than 1 failure in any functional group.</i>	<i>Good (3)</i>	Good

Table 11 Individual Trees (retained)

Condition assessment Criteria		Evidence		Pass/Fail
The tree is a native species (or at least 70% within the block are native species).		All native, see EcIA		Pass
The tree canopy is predominantly continuous, with gaps in canopy cover making up <10% of total area and no individual gap being >5 m wide (individual trees automatically pass this criterion).		Individual trees		Pass
The tree is mature (or more than 50% within the block are mature).		Some mature, some young		Fail
There is little or no evidence of an adverse impact on tree health by human activities (such as vandalism, herbicide or detrimental agricultural activity). And there is no current regular pruning regime, so the trees retain >75% of expected canopy for their age range and height.		No adverse health on most, ash dieback present on some.		Pass
Natural ecological niches for vertebrates and invertebrates are present, such as presence of deadwood, cavities, ivy or loose bark.		Some minor deadwood in tree and flaking bark and trunk is ivy clad and there are some small superficial knot holes on some.		Pass
More than 20% of the tree canopy area is oversailing vegetation beneath.		Mostly oversail adjacent car park, hard standing concrete path		Fail
Condition Assessment Result (/6)	<2	3-4	5-6	
Condition Assessment Score (1-3)	Poor (1)	Moderate (2)	Good (3)	Moderate

Table 16 Urban (A3)

Condition Assessment Criteria	Evidence	Pass / Fail
Vegetation structure is varied, providing opportunities for vertebrates and invertebrates to live, eat and breed. A single structural habitat component or vegetation type does not account for more than 80% of the total habitat area.	All ruderal, no variation	Fail
The habitat parcel contains different plant species that are beneficial for wildlife, for example flowering species providing nectar sources for a range of invertebrates at different times of year.	Variation in species present suitable for wildlife, see EclA for full results.	Pass
Invasive non-native plant species (listed on Schedule 9 of WCA) and others which are to the detriment of native wildlife (using professional judgement) cover less than 5% of the total vegetated area. Note - to achieve Good condition, this criterion must be satisfied by a complete absence of	None recorded.	Pass

Condition Assessment Criteria	Evidence	Pass / Fail
invasive non-native species (rather than <5% cover).		
Condition assessment results	Condition assessment score	Achieved
Results for habitats requiring assessment of 3 core criteria only (all urban habitats, except Open mosaic habitat on previously developed land, Bioswale, SuDS and Green roofs)		
Passes 0-1/3 core criteria	Poor (1)	
Passes 2/3 core criteria; OR Passes 3/3 core criteria but does not meet the requirements for Good condition within criterion C	Moderate (2)	Moderate
Passes all 3 core criteria; AND Meets the requirements for Good condition within criterion C	Good (3)	

APPENDIX 3 PROPOSED HABITAT CONDITION JUSTIFICATION

Table 7 – Other neutral grassland (C3)

Condition Assessment Criteria	Justification	Condition Pass/ Fail
1. The appearance and composition of the vegetation closely matches characteristics of the specific grassland habitat type (see UKHab definition). Wildflowers, sedges and indicator species for the specific grassland habitat type are very clearly and easily visible throughout the sward.	The grassland will be reseeded with a wildflower mix to increase the species richness of the grassland. The long-term management will include the annual cut and remove of vegetation which will reduce the fertility of the grassland in the long term.	Pass
2. Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20 per cent is more than 7 cm) creating microclimates which provide opportunities for insects, birds and small mammals to live and breed.	An approximate 1m buffer will be mown short to 5cm around the edges of the developed land, sealed surface all year round. This will provide areas of shorter grassland throughout the year. Approximately 10% of the grassland will be left uncut through the winter to provide some sections of tall tussocky grassland.	Pass
3. Cover of bare ground between 1% and 5%, including localised areas, for example, rabbit warrens.	It is expected that the long-term management of the grassland will provide some areas of bare ground for re-seeding but will not result in greater than 5% bare ground. If bare ground areas are present, they will be resown with a grassland mix at the appropriate time of the year.	Pass
4. Cover of bracken less than 20% and cover of scrub (including bramble) less than 5%.	Regular cuts will ensure that bramble and bracken do not encroach upon the grassland.	Pass
5. There is an absence of invasive non-native species (as listed on Schedule 9 of WCA, 1981). Combined cover of undesirable species ¹ and physical damage (such as excessive poaching, damage from machinery use or storage, damaging levels of access, or any other damaging management activities) accounts for less than 5% of total area.	The grassland will be regularly monitored to assess the coverage of these species and inform remedial actions. It is expected that weed species might become dominant in the first couple of years following re-seeding. However,	Pass

Table 5 Modified grassland (C2)

Condition Assessment Criteria	Evidence	Pass/Fail
There are 6-8 vascular plant species per m2 present, including at least 2 forbs. Note - this criterion is essential for achieving Moderate or Good condition.	A suitable flowering lawn seed mix will be utilised to provide a varied flower and grass mix.	Pass

Condition Assessment Criteria	Evidence	Pass/Fail
Where the vascular plant species present are characteristic of medium, high, or very high distinctiveness grassland, or there are 9 or more of these characteristic species per m2 (excluding creeping thistle, spear thistle, curled dock broad-leaved dock, common nettle, creeping buttercup, greater plantain, white clover and cow parsley), please review the full UKHab description to assess whether the grassland should instead be classified as a higher distinctiveness grassland, and then use the relevant condition sheet.		
Sward height is varied (at least 20% of the sward is less than 7 cm and at least 20% is more than 7 cm) creating microclimates which provide opportunities for vertebrates and invertebrates to live and breed.	All mown to a consistent sward height as will be amenity use.	Fail
Any scrub present accounts for less than 20% of the total grassland area. (Some scattered scrub such as bramble <i>Rubus fruticosus</i> agg. may be present). Note - patches of scrub with continuous (more than 90%) cover should be classified as the relevant scrub habitat type.	No scrub planted and any self-seeding will be removed via management.	Pass
Physical damage is evident in less than 5% of total grassland area. Examples of physical damage include excessive poaching, damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.	Damage will be likely given the amenity nature of the area and high footfall. Any damaged areas will be re-seeded as appropriate.	Fail
Cover of bare ground is between 1% and 10%, including localised areas (for example, a concentration of rabbit warrens).	Likely bare ground given proposed usage, any bare ground will be re-seeded where possible.	Fail
Cover of bracken <i>Pteridium aquilinum</i> is less than 20%.	None will be planted, any self-seeded will be removed via management.	Pass
There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA).	No invasives planted, any self-seeded will be removed via management.	Pass
Condition Assessment Result	Condition Assessment Score	Achieved
<i>Passes <3 criteria or 4-6 criteria, excluding essential criterion A</i>	<i>Poor (1)</i>	
<i>Passes 4 or 5 criteria, including essential criterion A</i>	<i>Moderate (2)</i>	Moderate

Condition Assessment Criteria	Evidence	Pass/Fail
<i>Passes 6 or 7 criteria, including essential criterion A</i>	<i>Good (3)</i>	

Table 6 Native hedgerows (PH1, 2, 3 and 4)

Condition Assessment Criteria	Evidence	Pass / Fail
A1. Height >1.5 m average along length	Will be planted and management utilised to have a low height to not obstruct users view.	Fail
A2. Width >1.5 m average along length	Planting will be staggered to create average width of over 1.5m	Pass
B1. Gap – Hedge base Gap between ground and base of canopy <0.5 m for >90% of length	Management will ensure minimal gaps between hedge base and ground. Any gaps will be planted up if required.	Pass
B2. Gaps – hedge canopy continuity Gaps make up <10% of total length; and No canopy gaps >5 m	Management will ensure minimal gaps between hedge canopy. Any gaps will be planted up if required.	Pass
C1. Undisturbed ground and perennial vegetation >1 m width of undisturbed ground with perennial herbaceous vegetation for >90% of length: · Measured from outer edge of hedgerow; and · Is present on one side of the hedgerow (at least).	Adjacent commercial pub and B&B will be located close to the hedge, therefore there is no space for undisturbed ground.	Fail
C2. Nutrient-enriched perennial vegetation Plant species indicative of nutrient enrichment of soils dominate <20% cover of the area of undisturbed ground	These species will not be planted, any growing will be cut and removed to remove nutrients.	Pass
D1. Invasive and neophyte species >90% of the hedgerow and undisturbed ground is free of invasive non-native plant species (including those listed on Schedule 9 of	None will be planted and any self-seeding will be removed.	Pass

Condition Criteria	Assessment	Evidence	Pass / Fail
WCA) and recently introduced species.			
D2. Current damage >90% of the hedgerow or undisturbed ground is free of damage caused by human activities		Given the close proximity to commercial usage, there is potential for disturbance and damage via occupants.	Fail
Condition results	assessment	Condition assessment score	Achieved
Hedgerows without trees			
<i>Fails a total of more than 4 attributes;</i> OR <i>Fails both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and B2 = Poor condition).</i>		Poor (1)	
<i>No more than 4 failures in total;</i> AND <i>Does not fail both attributes in more than one functional group (for example, fails attributes A1, A2, B1 and C2 = Moderate condition).</i>		Moderate (2)	Moderate
<i>No more than 2 failures in total;</i> AND <i>No more than 1 failure in any functional group.</i>		Good (3)	