

Land between Lodge Road and Tape Lane, Hurst

Addressing Appeal Site within Berkshire Local Nature Recovery Strategy (due to be published October 2025)

Purpose

- 1.1. Tyler Grange Group Limited ("TG") has been instructed by Mac Mic Strategic Land Limited ("the Appellant") to prepare this Note in response to Mrs Robinson's Statement (CD 13.8), to assist the Inspector.
- 1.2. It should be noted that Wokingham Borough Council (WBC) have removed RfR 6, after agreeing an updated Statutory Biodiversity Metric (CD11.5: 16452/BNG/4) by Duncan Fisher, Green Infrastructure Team Manager at the Council, as shown in his email of 9th July 2025 at Appendix 3 of the Ecology Evidence of Emily Major (CD5.4).
- 1.3. It is important to note that the agreed BNG metric (CD 11.5) is based on the illustrative masterplan and the final Biodiversity Gain Plan and Habitat Management and Monitoring Plan (HMMP) are for condition discharge at Reserved Matters.
- 1.4. It is noted that the current draft Local Nature Recovery Strategy (LNRS) may be published by the time a decision on the appeal is reached. Therefore, this note considers the implications of application of the LNRS on the BNG metric scoring. The intention is that if the appeal is allowed then, at that detailed design stage a review would be conducted of the habitat enhancement/creation measures to seek alignment with the published LNRS aims and objectives.

The Berkshire Local Nature Recovery Strategy (LNRS)

- 2.1. The Royal Borough of Windsor and Maidenhead (RBWM) Together website states that '*Local Nature Recovery Strategies (LNRSs) are spatial strategies to recover nature across England. There are 48 in total and together, they will cover the country in a Nature Recovery Network. The Royal Borough of Windsor and Maidenhead have been responsible for developing the Berkshire LNRS. Bracknell Forest Council, Reading Borough Council, Slough Borough Council, West Berkshire District Council, Wokingham Borough Council and Natural England have supported the creation. The Environment Act 2021 states that every county area must develop a Local Nature Recovery Strategy*'.
- 2.2. The Berkshire LNRS is currently in pre-publication stage and is anticipating publication in October 2025.



LNRS and Planning

- 3.1. The National Planning Practice Guidance (NPPG) states:

“The Local Nature Recovery Strategy is an evidence base which contains information that may be a ‘material consideration’ in the planning system, especially where development plan documents for an area pre-date Local Nature Recovery Strategy publication. It is for the decision-maker to determine what is a relevant material consideration based on the individual circumstances of the case.

In cases where there is a draft Local Nature Recovery Strategy that has been consulted upon but not yet finalised and published, the draft strategy may contain useful evidential information that can support appropriate decision making.”

*Paragraph: 047 Reference ID: 8-047-20250219
Revision date: 19 02 2025’*

- 3.2. Therefore, whilst the Berkshire LNRS is not yet published, the evidence base may be relevant in the decision making process.
- 3.3. The West Midlands Combined Authority have a published LNRS, which is an example of how other authorities are approaching LNRS, that states:

“Firstly, it is important to make clear that the mapped focus areas for nature recovery do not prevent any development (or other activity) from taking place. However, in making planning decisions, it is advised that developers and planners consider:

- That the impact of development on nature may be greater in the mapped focus areas, particularly where it is close to existing habitats or may compromise connectivity between habitats.*
- That developments in the mapped focus areas should take particular consideration of how they can make a positive contribution towards the recommended measures in that area. For example, if a development takes place in an area where woodland or wood pasture creation is mapped as a measure, the development could make additional effort to incorporate native trees and wooded corridors so as to make a positive contribution towards nature recovery.*

Even outside of the mapped focus areas, the LNRS could be used to help inform how a development could best contribute towards nature recovery by finding out which measures are recommended in the proposed development location.”

LNRS and Biodiversity Net Gain (BNG)

- 4.1 The Statutory biodiversity metric: user guide published by Defra further states:

“The Environment Act 2021 created a new biodiversity net gain condition for planning permissions. Developments will have to leave the natural environment in a measurably better state than it was before. Project leads, such as developers, must use the biodiversity metric to calculate the biodiversity net gain of a project or development.



Development projects that create, enhance or recover habitat in locations which are mapped in a local nature recovery strategy will get a higher biodiversity value in the biodiversity metric than they would in other locations. This is because they are in a more strategic location for nature recovery.

This will encourage the people in charge of projects to make changes that meet local priorities for nature recovery."

- 4.2 Therefore, when published, the LNRS will have an impact on how the 'Strategic significance' multiplier is applied within the Statutory Biodiversity Metric. This is because it offers an incentive to deliver measures that align with the LNRS in a given location by providing an uplift in Biodiversity Units for a specific enhancement/habitat creation measure in that area. The Statutory Biodiversity Metric User guide states on page 27 :

"Where a Local Nature Recovery Strategy (LNRS) has been published, use the LNRS and descriptions set out in table 7 to assign strategic significance. ...Once an LNRS has been published, the baseline strategic significance values for habitat parcels in that area should always be scored as low. You may need to refer to multiple LNRS areas and make separate assessments for each habitat parcel (including separate assessments for on and off-site habitats)."

- 4.3 Therefore, any post-development habitats enhanced or created that align with the area and measures mapped in the LNRS would be assigned a score of 'high strategic significance', and provide an uplift in Biodiversity Units. This does not apply to this appeal, as the LNRS is not yet published.

The Transition Period

- 5.1 The Statutory Biodiversity Metric User guide directs users to the worked examples in the [LNRS & Strategic Significance Multiplier Transition Guidance](#) published by the Planning Advisory Service (PAS) on page 27.

"Pre-development baseline values submitted prior to the published LNRS should remain unchanged. If the LNRS is published during a live application or prior to discharge of the pre-commencement condition, then the initial post-development value may need to be updated."

- 5.2 Therefore, the baseline for this application is fixed and will remain as the updated Statutory Biodiversity Metric (CD11.5: 16452/BNG/4) agreed by Duncan Fisher, Green Infrastructure Team Manager at the Council, as shown in his email of 9th July 2025 at Appendix 3 of the Ecology Evidence of Emily Major (CD5.4).
- 5.3 This note has been prepared to demonstrate the implications of the transition period and final publication of the LNRS on the BNG metric to give assurance that the required 10% can still be delivered. The Statutory Biodiversity Metric will be updated during the detailed design stage. If at that stage the LNRS has been published, the strategic significance scores will be updated accordingly.
- 5.4 Therefore, in summary, in the transition period, the baseline strategic significance scores are assessed using the methodology 'pre-LNRS publication' and the post-development strategic significance scores are assessed using the 'post-LNRS publication' methodology. Once a LNRS is published, for a new application, the 'post-LNRS publication' methodology applies to both the baseline and the post-development habitats.



Berkshire LNRS and The Appeal Site

6.1 CD 13.8 states that the Appeal Site falls within the pre-published LNRS as an opportunity for:

- ACB (An Opportunity for Biodiversity site)
- PM03 Restoration of Grassland
- PM08 Veteranize Trees Site
- PM11 Create Wet woodland site
- PM18 to create and restore a network of clean water ponds site
- PM01 to create and enhance hedgerows

6.2 This is also shown in the Berkshire Local Nature Recovery Strategy Map¹ (Figure 1 below).

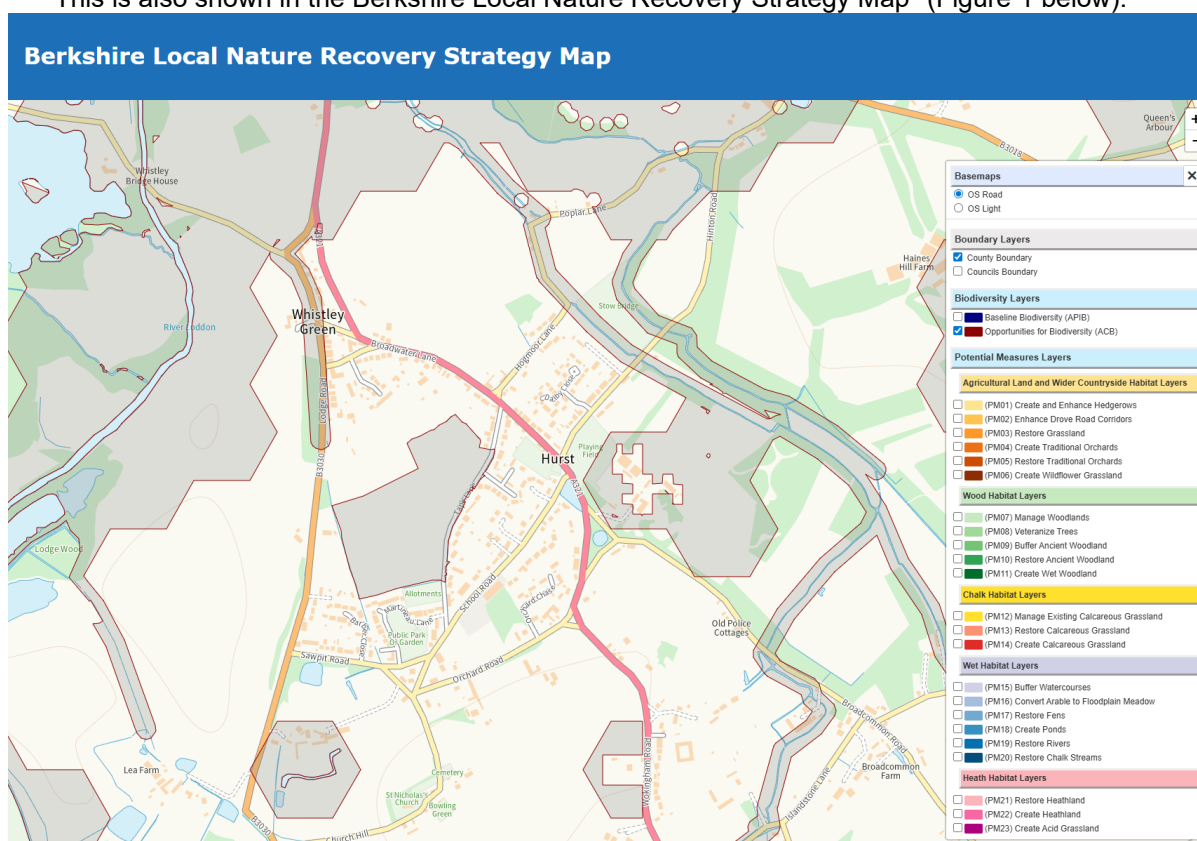


Figure 1 Berkshire Local Nature Recovery Strategy Map showing Appeal Site in Opportunity for Biodiversity (ACB) .

6.3 At the outline stage, the Appellant is delivering the mandatory +10% BNG on-site, the following measures are being delivered as part of the development (see updated and agreed Statutory Biodiversity Metric CD 11.5):

- 0.82 ha of grassland enhancement from 'modified grassland' in 'moderate condition' to 'other neutral grassland' in 'good' condition.'
- 0.43 ha of other neutral grassland in 'poor' condition' to other neutral grassland in 'good'



condition.

- 0.13 ha of created pond habitat in 'moderate' condition'.
- 0.33 km of enhancement of species-rich native hedgerow in 'good condition' to species-rich native hedgerow with trees in 'good condition'.
- 0.07km of created native hedgerow in 'moderate condition'.
- The veteranisation of existing trees forms part of the agreed Tree Assessment and Compensation Strategy (CD.11.3, paras 3.27 – 3.29). The strategy also includes measures to improve the condition of existing veteran trees on the site. This is directly consistent with the objectives of PM08.

6.4 It is important to note that the agreed BNG metric (CD 11.5) is based on the illustrative masterplan and the final Biodiversity Gain Plan and Habitat Management and Monitoring Plan (HMMP) are for condition discharge at Reserved Matters.

6.5 It is noted that the current draft LNRS is expected to be finalised by the time a decision on the appeal is reached. The intention is, therefore, to review the habitat enhancement/creation measures and the implications of the LNRS on the metric to ensure net gain can be achieved. There will be further opportunity to refine any habitat enhancements/creation measures, if feasible, at the Reserved Matters stage.

The Appeal Site and Alterations to Post-Development BNG scores

7.1 As noted in para. 5.5 above, the different approaches to the application of strategic significance in both the transition period and once a LNRS is published can result in different outcomes to a metric. The table below shows a comparison between the impact of the different methodologies of applying 'strategic significance' scores in the agreed Statutory Biodiversity Metric. This clearly demonstrates that the agreed metric provides a worst case in terms of achievable BNG in habitats and hedgerows and that when applying the LNRS, there is an uplift in BNG in these units. Whilst there would be a reduction in watercourse units in the transition period, there is continued achievement of >10% as required by legislation and policy..

	Agreed Statutory Biodiversity Metric (without deculverting)	Published LNRS Methodology applied (Both baseline and post-development values updated)	Transition Period Methodology applied (only post-development values updated)
Habitat unit change in percentage	+10.82%	+23.10%	+12.09%
Hedgerow unit change in percentage	+13.15%	+21.00%	+15.53%
Watercourse unit change in percentage	+23.75%	+23.75%	+12.50%
Assumptions	N/A	All baseline habitats are of 'low strategic significance. The following will meet the LNRS objectives and will therefore be of 'high strategic	All baseline habitats remain as in the agreed Statutory Biodiversity Metric. The following will meet the LNRS objectives and will therefore be of



		significance': • PM03 Grassland enhancement from 'modified grassland' in 'moderate condition' to 'other neutral grassland' in 'good' condition.' • PM03 Enhancement of other neutral grassland in 'poor' condition' to other neutral grassland in 'good' condition. • PM03 Creation of other neutral grassland in 'good' condition. • PM01 Enhancement of species-rich native hedgerow in 'good condition' to species-rich native hedgerow with trees in 'good condition'. • PM01 Creation of native hedgerow in 'moderate condition'.	'high strategic significance'. All other post-development habitats are of 'low strategic significance: • PM03 Grassland enhancement from 'modified grassland' in 'moderate condition' to 'other neutral grassland' in 'good' condition.' • PM03 Enhancement of other neutral grassland in 'poor' condition' to other neutral grassland in 'good' condition. • PM03 Creation of other neutral grassland in 'good' condition. • PM01 Enhancement of species-rich native hedgerow in 'good condition' to species-rich native hedgerow with trees in 'good condition'. • PM01 Creation of native hedgerow in 'moderate condition'.
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