

BLADE

BIODIVERSITY NET GAIN REPORT

NIGRA HOUSE, MULBERRY BUSINESS PARK,
FISHPONDS ROAD, WOKINGHAM, RG41 2GY

ON BEHALF OF

TUNGSTEN PROPERTIES

JUNE 2024

V2

BIODIVERSITY
LANDSCAPE
ARBORICULTURE
DESIGN
ECOLOGY

Report Data	
Title	Biodiversity Net Gain Report
Site Address	Nigra House, Mulberry Business Park, Fishponds Road, Wokingham Road, RG41 2GY
Client	Tungsten Properties
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1.0 INTRODUCTION

Background to the Development

- 1.1 BLADE Ecology Ltd was commissioned by Tungsten Properties to undertake an update Biodiversity Net Gain Plan at for Nigra House, Wokingham (centred on Ordnance Survey grid reference SU 80213 67747).
- 1.2 This document has been produced to address the mandatory requirements for BNG under Schedule 7a of The Town and Country Planning Act 1990 (as inserted by Schedule 14 of The Environment Act 2021).
- 1.3 The application site boundary is shown in Figure 1.



Figure 1: Application Site Boundary (Google Earth, 2020)

Full planning consent was granted by Wokingham Council for the '*proposed demolition of Nigra House and the erection of 12 no. employment units (Use Classes E (g) (ii) and (iii) and B8) with new vehicular access and associated works including car parking, servicing and landscaping. The proposals are for construction of a single building for employment purposes with vehicular access and associated landscaping*' (application number: 221409) on 27 March 2023.

Previous Survey Work and Ecological Baseline

The baseline for the site has taken from the Biodiversity Net Gain Report (see FPCR, 2024). This includes habitat classification, habitat areas, condition assessments and strategic significance of habitats.

- 1.4 Proposed habitat conditions are also of that described within the original Biodiversity Net Gain Report produced by FPCR but have been remapped in line with the detailed landscape plan produced by BLADE Landscape Architects Ltd.

Survey Objectives

- 1.5 The objectives of the report are to:
- Calculate baseline for existing habitat and hedgerow units for the site using habitats, condition assessments and strategic significance provided by FPCR
 - Inform the masterplan in line with the mitigation hierarchy, Biodiversity Net Gain hierarchy, and Biodiversity Net Gain: Good Practice Principles for Development (Baker et al., 2019).

2.0 BIODIVERSITY NET GAIN AND PLANNING POLICY

Biodiversity Net Gain

- 2.1 Biodiversity Net Gain (BNG) is defined as 'development that leaves biodiversity in a better state than before, and an approach where developers work with local governance, wildlife groups, landowners and other stakeholders in order to support their priorities for nature conservation'.
- 2.2 In 2016, the BNG: Good practice principles for development was published to support developments across the UK achieve BNG in accordance with good practice. These principles aimed to set a benchmark of 'what good looks like' and they include the mitigation hierarchy and avoiding impacts of irreplaceable habitats. In 2019, the principles were supplemented with practical guidance on designing, implementing and the long-term maintenance and monitoring of BNG through the project lifecycle.
- 2.3 Good practice principles for biodiversity net gain are set out within Table 1.1 of Biodiversity Net Gain: Good Practice Principles for Development (Baker et al., 2019):

Table 1: The UK's good practice principles for biodiversity net gain (after Baker, 2016)

Principle	In Practice
Apply the mitigation hierarchy	Do everything possible to first avoid and then minimise impacts on biodiversity. Only as a last resort, and in agreement with external decision makers where possible, compensate for losses that cannot be avoided. If compensating for losses with the development footprint is not possible or does not generate the most benefits for nature conservation, then offset biodiversity losses by gains elsewhere.
Avoid losing biodiversity that cannot be offset elsewhere	Avoid impacts on irreplaceable biodiversity – these impacts cannot be offset to achieve no net loss / net gain.
Be inclusive and equitable	Engage stakeholders early, and involve them in designing, implementing, monitoring and evaluating the approach to net gain. Achieve net gain in partnership with stakeholders where possible.
Address risk	Mitigate difficulty, uncertainty and other risks to achieving net gain. Apply well-accepted ways to add contingency when calculating biodiversity losses and gains in order to account for any remaining risks, as well as compensate for the time between the losses occurring and the gains being fully realised.
Make a measurable net gain contribution	Achieve a measurable, overall gain for biodiversity and the services ecosystems provide while directly contributing towards nature conservation priorities.
Achieve the best outcomes for biodiversity	Achieve the best outcomes for biodiversity by using robust credible evidence and local knowledge to make clearly justified choices when:

Principle	In Practice
	- delivering compensation that is ecologically equivalent in type, amount and condition that accounts for the location and timing of biodiversity losses - compensating for losses of one type of biodiversity offsetting by providing a different type that delivers greater benefits for nature conservation - achieving net gain locally to the development whilst also contributing towards nature conservation priorities at local, regional, and national levels. - enhancing existing or creating new habitat - enhancing ecological connectivity by creating more bigger, better and joined areas for biodiversity.
Be additional	Achieve nature conservation outcomes that demonstrably exceed existing obligations i.e. do not deliver something that would occur anyway
Create a net gain legacy	Ensure net gain generates long-term benefits by: - engaging stakeholders- and jointly agreeing practical solutions that secure Net Gain in perpetuity - planning for adaptive management and securing dedicated funding for long-term management - designing net gain for biodiversity to be resilient to external factors, especially climate change - mitigating risks from other land uses - avoiding displacing harmful activities from one location to another - supporting local-level management of net gain activities
Optimise sustainability	Prioritise BNG and, where possible, optimise the wider environment benefits for sustainable society and economy
Be transparent	Communicate all net gain activities in a transparent and timely manner, sharing the learning with all stakeholders.

National Planning Policy

National Planning Policy Framework (NPPF)

- 2.4 The National Planning Policy Framework (NPPF) (Department for Levelling Up, Housing & Communities, 2023) provides guidance for Local Planning Authorities (LPAs) in creating development plans and determining applications.
- 2.5 Section 180 states that planning policies and decisions should contribute to and enhance the natural and local environment by:
- protecting and enhancing sites of biodiversity value (in a manner commensurate with the statutory status or identified quality in the development plan);
 - recognising the wider benefits from natural capital and ecosystem services – including the economic and other benefits of trees and woodland; and
 - minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressure.
- 2.6 Section 181 states that plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental value; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at landscape scale across local authority boundaries.
- 2.7 Section 185 states that in order to protect biodiversity, plans should:
- identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of internal, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation; and
 - 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
- 2.8 Section 186 states that when determining planning authorities should apply the following principles:
- if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

- development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;
- development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and
- 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.

2.9 Section 187 states that the following should be given the same protection as habitats sites:

- potential Special Protection Areas and possible Special Areas of Conservation;
- listed or proposed Ramsar sites; and
- sites identified, or required, as compensatory measures for adverse effects on habitats sites, potential Special Protection Areas, possible Special Areas of Conservation, and listed or proposed Ramsar sites.

2.10 Section 188 states that the presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects) unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site.

2.11 Section 32 states that local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered).

Legislation

Biodiversity Action Plan (BAP) Habitats and Species

- 2.12 The UK Biodiversity Action Plan (HMSO 1995, 1998; UKBAP 2007) lists species and habitats which have undergone significant declines in recent years and for which conservation is a priority in order to preserve biodiversity in the UK. The BAPs provide a list of actions to be implemented to halt or reverse these declines. These species and habitats are identified as Habitats and Species of Principal Importance for the conservation of biological diversity in England under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of the NERC Act, planning policy and underpinning guidance (ODPM, 2005)

3.0 METHODOLOGY

Condition Assessments

- 3.1 Habitat classification and condition assessments have been undertaken by FPCR (see FPCR, 2024). BLADE Ecology have remapped the results of this assessment based on the updated detailed landscape plan produced by BLADE Landscape Architects shown in Appendix A.
- 3.2 Descriptions of habitats have been detailed within the former Biodiversity Net Gain Report (FPCR, 2024).

Calculating Biodiversity Units

- 3.3 The Statutory Biodiversity Metric calculation tool. was used to calculate the baseline (habitat and hedgerow units). Metric calculations have been undertaken by E. Seaton BSc (Hons) MCIEEM.

4.0 RESULTS

Habitat Creation

4.1 The following habitat creation is proposed (see Detailed Landscape Proposals in Appendix A for locations).

- 0.003ha of other introduced scrub (condition assessment n/a).
- 0.016ha of mixed scrub in in 'poor' condition.
- 0.116ha of modified grassland in 'moderate' condition.
- 13 small trees in 'moderate' condition.
- 0.119km of native species-rich hedgerow

4.2 The following criteria will be targeted to allow the modified grassland to achieve 'moderate' condition:

- There are 6-8 vascular plants per m² present, including at least two forbs
- Any scrub to account for less than 20% of grassland area.
- Physical damage is evident in less than 5% of grassland area. Examples of physical damage include damage from machinery use or storage, erosion caused by high levels of access, or any other damaging management activities.
- Cover of bracken *Pteridium aquilinum* to be less than 20%.
- There is an absence of invasive non-native plant species (as listed on Schedule 9 of WCA).

4.3 The below criteria will be targeted to allow proposed trees to achieve 'moderate' condition:

- The tree is a native species
- The tree canopy is predominantly continuous (individual trees automatically pass this criterion)
- More than 20% of the tree canopy area is oversailing vegetation beneath.

Habitat Retention

4.4 A total of 0.029km of non-native hedgerow will be retained along the south-western boundary.

Habitat Enhancement

- 4.5 Seven small trees in 'poor' condition along the western boundary are to be enhanced to 'moderate' condition through targeting the additional two criteria:
- 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.
 - More than 20% of the tree canopy area is oversailing vegetation beneath.

Baseline Biodiversity Unit Calculations

- 4.6 The site is formed from 2.60 habitat units and 0.03 hedgerow units.

Table 2: Habitat Biodiversity Impact

Factor	Units
Baseline units	2.60
Post-intervention biodiversity units	1.77
Total net unit change	-0.83
Total net % change	-31.89%
Trading Rule Satisfied	No

Table 3: Hedgerow Biodiversity Impact

Factor	Units
Baseline units	0.03
Post-intervention biodiversity units	0.83
Total net unit change	+0.80
Total net % change	+2747.11%
Trading Rule Satisfied	Yes

- 4.7 The proposals set out within the detailed landscape proposals will deliver a -0.83 (-32.15% loss) for habitat units and a +0.81 (+2747.11%) gain for hedgerow units.
- 4.8 There is a deficit of 1.08 habitat units required to achieve +10%. The following units will be required to address the deficit and satisfy the trading rules:

- 1.08 individual tree (Tier A1) units
- 0.1 woodland and forest (Tier A2) units

4.9 Acquisition of these units is currently being explored though various credit brokers.

5.0 REFERENCES

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APPENDIX A

Plans

Detailed Landscape Proposals

APPENDIX B

Qualifications and Experience

BLADE Ecology Ltd is Registered Practice of the Chartered Institute of Ecology and Environmental Management (CIEEM). A comprehensive range of ecological services are offered including Preliminary Ecological Appraisal (PEA), Ecological Impact Assessment (EclA), Habitat Regulations Assessment (HRA), Biodiversity Impact Assessment (BIA) and European Protected Species (EPS) Surveys / Licensing.

The practice works closely work closely with clients to achieve their aspirations alongside securing the best outcomes for the environment. With wildlife legislation and policy as its basis; commercial awareness, pragmatism and defensible advice is combined to form Zebra Ecology's approach.

As well as offering a wide range of ecological services, BLADE Ecology offers an in-house collaborative approach in conjunction with BLADE Landscape Architects and BLADE Trees.

Emma Seaton BSc (Hons) MCIEEM

Emma holds a BSc (Hons) degree in Biology from the University of Sheffield and a postgraduate certificate in Ecological Consultancy. Her ecological experience includes Preliminary Ecological Appraisals, Ecological Impact Assessments (EclA), surveying for notable / European Protected Species and mitigation / licensing advice. She has held Natural England survey licences for bats (Class 2), great crested newts and white-clawed crayfish since 2015. She is also a Registered Consultant under the Bat Mitigation Class Licence (BMCL) licence and Earned Recognition consultant under the Natural England bat pilot project. Emma is a Full member of the Chartered Institute of Ecology and Environmental Management.

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