

Statement prepared by Belinda Robinson, Rosebank, Tape Lane, Hurst, RG10 0DP in respect of the Inquiry for Appeal APP/X0360/W/25/3364304 Land between Lodge Road and Tape Lane, Hurst. Up to 99 new homes, green infrastructure, open space, pedestrian and cycle links, recreational facilities and other associated infrastructure and access points on Lodge Road and Tape Lane with required improvements.

I have lived in Hurst for over 40 years, of which 22 have been opposite the appeal site. This statement is in addition to the previous objections I have made regarding this development.

Local Nature Recovery Strategies¹ play a key part under Section 102 of the Environment Act 2021 (**APPENDIX 1**) measures, including biodiversity net gain (BNG) and legally binding targets they are the first statutory, spatial strategies for nature which cover the whole of England, created to help reverse nature's ongoing decline; England is widely considered to be one of the most nature-depleted countries in the World. LNRS are needed where they have the most impact and help connect and expand existing areas of importance.

They will help support nature and "nature-based solutions" by drawing together and coordinating actions from existing plans and strategies and proposing what more should be done.

Forty eight (48) responsible authorities have been appointed to lead the LNRS for an area defined by the Secretary of State² (**APPENDIX 2**). Hurst falls under the Berkshire LNRS which is the responsibility of the Royal Borough of Windsor and Maidenhead Council (RBWM (**APPENDIX 3**) whose status for the LNRS³ (**APPENDIX 4**) is that Public Consultation has taken place, changes made to the documents and Local Habitat Map, and the final version will be approved in September and published in October 2025. RBWM have confirmed by email yesterday (attached) that as of 9th August, all supporting Authorities including Natural England have now given their full support to the Berkshire LNRS.

The current NPPG⁴ for Biodiversity⁵ refers to S40 NERC Act 2006⁶ (**APPENDIX 5**) and Environment Act 2021 which states that LPA's must have regard to LRNS in both plan-making and decisions.

¹ LGA/PAS What are LNRS? [Local Nature Recovery Strategies | Local Government Association](#)

² [Local nature recovery strategies - GOV.UK](#)

³ [Berkshire's Local Nature Recovery Strategy | RBWM Together](#)

⁴ [Planning practice guidance - GOV.UK](#)

⁵ [Natural environment - GOV.UK](#)

⁶ Natural Environment and Rural Communities Act 2006 [Natural Environment and Rural Communities Act 2006;](#)

The Environment Act 2021 S40 states that ALL public authorities in England have a duty to:

- “consider how they can conserve and enhance biodiversity” and “in complying with this duty they must have regard to any relevant LNRS”.
- “Every public body must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving and enhancing biodiversity. Conserving biodiversity includes, in relation to a living organism or type of habitat, restoring or enhancing a population or habitat’s”.
- Environment Act 2021 also deals with decision making and states “The LNRS 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 LNRS 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 LNRS 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,**”

In June 2025 the Office for Environmental Protection (OEP)⁷ in S6.5 of their ‘Review of LNRS’ Laid before Parliament⁸ (**APPENDIX 6**) states: *These are legal provisions that are intended to ensure that LNRS are given consideration in a range of circumstances – it is important for these provisions to be exercised in a way **that actively** supports LNRS delivery wherever possible⁹*

The Berkshire LNRS has identified ALL of this Appeal site as a site which will have the most impact to help connect and expand existing areas of importance and has assigned the following specific measures to that site:

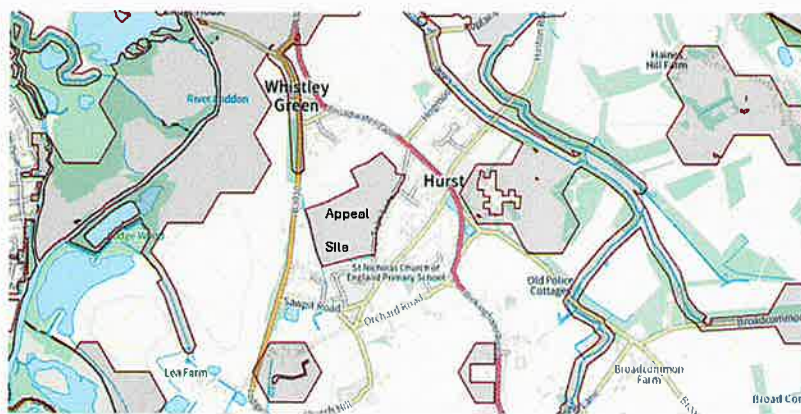


Image 1: LNRS Site Identified on Berkshire LNRS map as an ACB Area¹⁰.

⁷ [A review of Local Nature Recovery Strategies and their role in contributing to nature recovery commitments in England](#)

⁸ pursuant to S29 of the Environment Act 2021

⁹ Natural Environment and Rural Communities Act 2006, s 40(2A).

¹⁰ [Berkshire Local Nature Recovery Strategy Map](#)

- **ACB An Opportunity for Biodiversity site (Image 1).** These are the most important and most likely successful places across the country to start recovering nature¹¹.
- **PM03 Restoration of Grassland site** (To improve diversity and quality of pasture sward to encourage diversity across entire, contiguous parcel of habitat type aiming for greater than 45 species).
- **PM08 Veteranize Trees site** (Undertake management activities to veteranize individual trees outside woodland with an overall priority to improve the quality and connectivity of wood pasture and parkland)
- **PM11 (Image 2) Create Wet Woodland site** (For those sites in proximity to existing wet woodland with the overall priority to increase the extent and connectivity of wet woodland to increase patch size and connectivity).

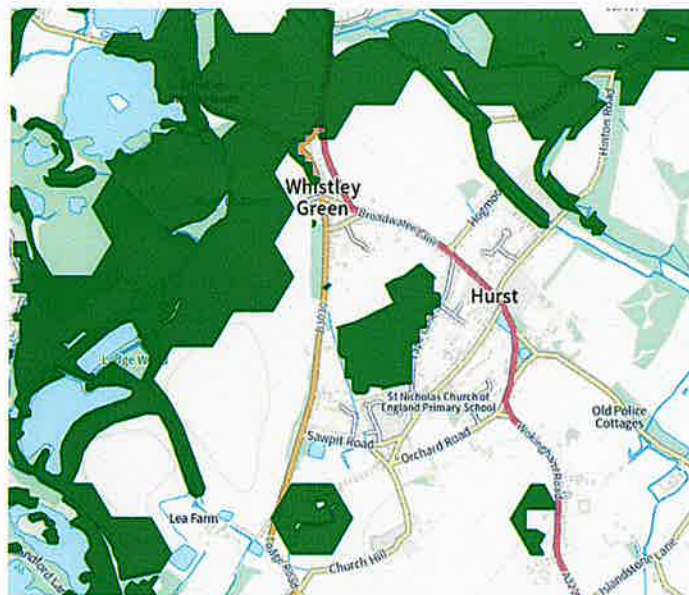


Image 2 LNRS PM11 – Designated as a site to create Wet Woodland

- **PM18 (Image 3) to create and restore a network of clean water ponds site** (Focusing on land uses and habitats which generate clean water (e.g. unimproved grassland).
- **PM01 includes the appeal site boundary along Tape Lane to Create and Enhance Hedgerows** (specifically to reconnect relic trees with the overall priority to improve the quality of habitats in agricultural land and the wider countryside).

This development proposal removes large sections of protected hedgerow in Tape Lane to provide 2 access points and visibility splays to the proposed estate.

¹¹ [Berkshire Local Nature Recovery Strategy Map](#)

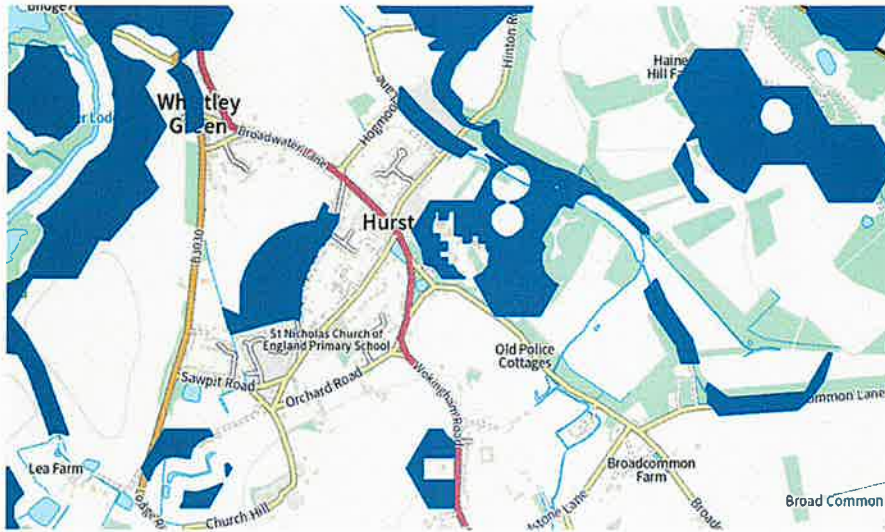


Image 3: LNR PM18 Designated to Create Ponds

This information effectively highlights the importance this site will play in the recovery of nature specifically in this area as set out by the LNR. The appellants Environmental Impact Assessment and Ecology Evidence¹² have not taken the LNR into account and the illustrative BNG mitigation proposals will not and cannot fulfil, enable, replace or compensate for the loss of this site as an LNR designation and therefore the current **and future harm is significant** to the biodiversity habitat of this area. The harm assessment by the Appellant has been woefully underestimated as the opportunity for conserving, restoring and enhancing habitat and improving connectivity as outlined by the LNR and will be impossible to achieve once development such as this takes place.

Introducing 99 dwellings, together with approximately 250 residents, with all the traffic that cuts directly through the site, the close boarded gardens, lighting, domestic pets and associated residential paraphernalia conflicts and overrides the principle and purpose of the LNR for this site.

Ironically and realistically considering the LNR, NERC, Environment Act, NPPG and NPPF this LNR site should never be developed but presents a perfect opportunity as a site to offset BNG for the sustainable developments built elsewhere in the Borough as well as conserving and enhancing biodiversity as laid out by the LNR.

This outline proposal is totally against the principles of the LNR and will not conserve and enhance the natural environment as per S15 of the NPPF and this appeal should be dismissed.

¹² CD5.4 Ecology Evidence of Miss Emily Major [Report Template](#)

Appx. 6 minutes speaking time.

Appx 1063 words excluding heading, footnotes and appendices

Attached: Email dated 11 August, 2025 from Rosie Street, Berkshire NRS Manager

APPENDICES (as attachments)

- 1 Environment Act 2021 S102
- 2 Government Policy Paper LNRS 2024
- 3 The Berkshire LNRS – Description of Area and its opportunities
- 4 RWMB latest statement regarding Berkshire LNRS
- 5 NERC Act 2006 Part 3 S40
- 6 OEP Review for Parliament on LNRS S6.5 June 2025

LNRS evidence for Planning Appeal in Wokingham commencing 12th August

From Rosie Street <Rosie.Street@RBWM.gov.uk>

Date Mon 11/08/2025 12:17

To Belinda Louise Robinson <belindalouiserobinson@hotmail.com>

Hi Belinda,

Thanks for your email and interest in using the Berkshire LNRS to support nature recovery. You are correct in the timings: it is hoped that the LNRS will be published in October after a September RBWM cabinet meeting.

I have just checked and can confirm that once approved by the RBWM cabinet and published, the area you refer to will still be in the final LNRS map marked as an Opportunity area for multiple measures. At this time, we don't have a downloadable version of the map available until publication. Once published, the layers of the map will be able to be sent out downloadable upon request.

If it helps for strength to your argument, as of Friday the Berkshire LNRS now has the support of all Supporting Authorities, including Wokingham Borough Council and Natural England. The Berkshire LNRS has been through an extensive engagement process and used up to date habitat information to select the most important opportunity areas for nature recovery in Berkshire.

I hope this helps.

Best wishes,

www.rbwm.gov.uk



Rosie Street

Berkshire Nature Recovery Strategy Manager

Sustainability and Climate Team

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The Braywick Nature Festival 2025 is 28th July – 2nd August. [Find out more here.](#)

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