



MIDDLEMARCH

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West Berkshire Council
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Market Street
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(Via Submission to the Planning Portal)

19th June 2024

Dear Fiohn,

Application 24/00145/FULMAJ - Land at Hoad Way, Theale: Outline Biodiversity Net Gain Strategy

Following our meeting on 7th June 2024, I am writing to provide further information regarding the proposed biodiversity net gain strategy for the above site.

Mitigation hierarchy

The site has been subject to several design iterations with the biodiversity metric tool (versions 2.0 and 4.0) being used to help inform layout options for avoiding or minimising biodiversity losses in the first instance. The current layout (as set out in the Soft Landscaping Plan Drawing FIRS3002-02-F by Turley) shows a substantial scaling back of the net developable area¹ to accommodate the retention of 24% of the neutral grassland present in the site, along with the maintenance of peripheral areas of lowland mixed and other broad-leaved woodland, hedgerows and trees.

The replacement of neutral grassland has been a primary focus for the on-site landscaping to compensate for any unavoidable losses resulting from the proposed development. An additional 0.9 ha of neutral grassland creation is subsequently proposed as part of the landscaping scheme, utilising opportunities available in the informal open space and the attenuation basin along the eastern, western and northern peripheries of the site respectively. The establishment of these grassland areas using an appropriate species-rich meadow mixture for loam and damp (attenuation basin) soils will ensure that they are optimised for their contribution to the scheme's biodiversity net gain objectives.

The extent of neutral grassland proposed was balanced alongside the need for new tree, shrub thicket (scrub) and hedgerow planting, which is required to address landscape and visual considerations. The use of native tree and shrub planting in these areas will, however, ensure that they have some function for biodiversity, including, for example, new expanded foraging / dispersal areas for bat activity and nesting habitat for breeding birds. Due to only minor losses of hedgerow, the additional hedgerow planting proposed will secure a residual net gain of hedgerow value

¹ Compared to previous site layout in Application 21/02029/COMIND submitted in July 2021.



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equivalent to 1.21 Biodiversity Units (BU) (hedgerows) (See Middlemarch Report RT-MME-159730-05-Rev B).

Habitat Management and Monitoring Plan

All proposed habitats on site will be subject to long-term management to ensure they establish and are maintained at their intended target values. A Habitat Management and Monitoring Plan (HMMP) will be prepared for all on-site habitats setting out the conservation objectives, establishment measures and adaptive management prescriptions needed to maintain the habitats in the long-term. A monitoring strategy will also be included, setting out the approach for reviewing progress against the conservation objectives of the plan and providing feedback for periodic reviews of the management approach. It is proposed that the HMMP will be secured by way of a planning condition.

Residual Loss of Habitat

The Biodiversity Metric Assessment produced by Middlemarch (Report RT-MME-159730-05-Rev B) indicates that, when accounting for the above avoidance and compensation measures, there will be a residual loss of -19.84 BU (Habitats), which increases to -21.89 BU once habitat trading rules have been accounted for. This residual loss is unavoidable because:

- The site principally comprises neutral grassland, which, whilst species-poor, is a medium distinctiveness habitat and so makes a large contribution towards the site's baseline biodiversity value. Replacing the value of this habitat within the landscaping areas is deemed unfeasible given the limited area of land remaining for landscaping within the site and the management constraints that restrict higher target habitat conditions (e.g. absence of grazing).
- The nature of the development (i.e. a large industrial shed and service yard) leaves limited options for adapting the layout to accommodate additional areas of landscaping. Whilst some landscaping is proposed within the service yard, these are likely to be subject to some regular disturbance (lighting, noise, visual) and so are unsuited to habitats other than lower value ornamental planting that can be readily replaced / re-created where required.

Consequently, it is proposed that the residual loss of 21.89 BU (Habitats) will be compensated by using a local off-site biodiversity compensation scheme (See below).

Offsite Biodiversity Compensation Scheme

The need for an off-site compensation solution to address the residual loss of habitat units was identified during the design stages. Local habitat bank providers were subsequently contacted to identify available projects that could:



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- a) Compensate for the residual loss of 21.89 BU overall.
- b) Deliver at least 21.73 BU of neutral grass and 0.16 BU of other broad-leaved woodland to meet the trading rules of the metric.
- c) Secure the long-term management of the habitats for a minimum of 30 years.
- d) Be underpinned by a legal agreement or other enforceable mechanism to safeguard delivery during the management period; and,
- e) Be situated in the West Berkshire local authority area or the Thames Valley National Character Area in order to be classified as 'local' within the biodiversity metric.

Two habitat bank providers were identified that fulfilled this criteria and talks are in progress with each provider to secure purchase of these credits as necessary upon the grant of planning permission. The final details of the proposed scheme and its contribution towards the scheme's biodiversity net gain objectives, will be included in a Biodiversity Net Gain Framework Plan, which will be submitted for local authority approval prior to commencement of the development. It is anticipated that this framework plan will be secured by way of a Section 106 Agreement to give the local authority regulatory oversight of the final BNG proposals.

Biodiversity Net Gain

The application for the proposed development was submitted prior to the 12th February 2024 and so is exempt from the 10% biodiversity net gain objective required by the Environment Act 2021². The BNG Strategy detailed in this report therefore sets out an approach that will achieve a minimum target of +0.01 BU, however once trading rules are applied the net gain is likely to exceed this minimum amount. It is anticipated that through the provision of planning conditions (HMMP) and a S106 agreement (Off-site Biodiversity Scheme) the combined on- and off-site biodiversity net gain measures, will ensure that an overall net gain of biodiversity can be secured, in accordance with the principles of the National Planning Policy Framework.

Yours sincerely

Richard Wheat ACIEEM
Principal Consultant
Middlemarch

Checked and approved by:

Louise Fox
Principal Consultant
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² Department for Environment, Food & Rural Affairs (DEFRA) (2024) *Biodiversity Net Gain: Exempt Developments*. Available <https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>