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masterplanning ■
environmental assessment ■
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urban design ■
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21 July 2023

Dear Jonathan,

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Surrey
RH5 6SX

BENNET COURT, READING – UPDATE BNG POSITION REV A

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Following the submission of the application for industrial development at Bennet Court, Reading, comments have been made by consultees relating to the need to provide Biodiversity Net Gain on-site, in line with the relevant policies in the Reading Local Plan, specifically Policy EN12 (Biodiversity and the Green Network). Several additional technical notes have been submitted following the submission to clarify the biodiversity net gain position on the site.

This supplementary technical note presents a summary overview of the challenges for achieving a Biodiversity Net Gain on this Site along with a justification for why the proposed mitigation measures designed into the scheme are considered appropriate. This technical note follows on from discussions held between Stantec and Reading Borough Council's (RBC) Case Officer, and aims to provide context to the design decisions made for the scheme.

The scheme has been updated following discussions on 18 July 2023 to include 0.064ha of green roofs in an attempt to maximise biodiversity provision on the Site (see Figure 2). Therefore, the following measures summarise the ecological enhancement that are being incorporated in the latest layout:

- Biodiverse green roofs – 0.064ha of biodiverse green roof to be included over the low-level office, to be designed and managed to achieve good condition.
- Tree planting – in total, ten medium trees and seven small trees will be planted on the Site, to compensate for the three trees lost to proposals and eight trees removed prior to purchase of the land¹.
- Retained grassland enhancement – reinstated grasslands will be re-seeded with a native species-rich seed mix of shade tolerant wildflowers
- Faunal enhancements – including bird, bat and insect boxes
- Hedgerow planting – an additional 57m of hedgerow to be planted.

There have been significant challenges to achieving net gain for this scheme, it has been agreed with the RBC case officer that there is scope to provide funds for off-site tree planting in order to ensure the scheme can achieve a net gain in biodiversity as demonstrated by Natural England's

¹ The number reported includes those trees large enough to be included within the BNG Metric (>75mm DBH) and those not accounted for within other habitat types, including hedgerows, hedgerows with trees, and ornamental shrub. This is in line with the Biodiversity Metric Guidelines 3.1 (<https://publications.naturalengland.org.uk/publication>), and UKHab Definitions Version 1.1 (ukhab.org). The tree loss reported has been informed by the AIA and review of the Natural Environmental Officer's comments (13.07.2023).

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Metric. This letter explores each of these challenges, applying our professional judgement on each to provide greater context around the decisions made during site design.

Site Baseline

It is important to establish that Natural England's Biodiversity metric is a relatively crude tool for assigning ecological baseline. The metric is a proxy tool only, and in many circumstances is not appropriate for determining ecological value. Grasslands present on site are of a low ecological value, being dominated by common and widespread species characteristic of urban environs including perennial rye-grass, white clover, creeping buttercup and greater plantain. The grasslands are regularly managed as amenity grassland with no linkages to other ecological valued habitats owing to the urban context they occur. The amenity grasslands on site have no designation and are not priority habitats, they are common in occurrence and could easily be created elsewhere, in terms of an Important Ecological Features (IEFs) within CIEEMs EIA guidance they do not qualify (Box 14), it is our expert judgement and experience that they also do not and cannot act as functional 'stepping stone' habitat, again due to their urban isolation. Despite this, due to the non-specific nature of the condition assessment criteria in the metric, the grassland has achieved 'good condition' which has presented a high baseline that is very difficult to compensate for in any urban setting.

There is no mechanism within the metric for adjusting the value of habitats dependant on their condition and only very limited mechanisms for assigning value based on species composition. Therefore, extensive areas of pasture grassland that support a somewhat diverse sward, with good structure can score the same value per ha as an isolated patch of amenity grassland that has not been mown for a short period (i.e. 1-2 years). It is our view that this crude mechanism for assigning value is not appropriate in many circumstances, in particular in urban environments such as those present on Site.

Disincentivised Urban Habitat Creation

The metric scores urban habitat creation measures, such as green roofs and green walls, poorly making it unproportional to compensate for loss of poor ecological valued amenity grasslands with such costly habitat creation measures. Again, the metric has no mechanism for adjusting the value of these habitats in urban environments. Arguably, in heavily urbanised locations such as the context of the Site, these habitats can represent optimal habitat creation measures and it is our professional judgement that their inclusion in the scheme should be looked on more favourably than the metric currently does.

Green roofs in particular can support an excellent diversity of plants and invertebrates and, if designed appropriately, would clearly provide a greater degree of species diversity and interest than the amenity grassland areas currently present onsite. Despite this, they are scored poorly in the metric and taking an approach that focuses solely on the proxy numbers provided by the metric can be detrimental to site design when trying to build in biodiversity in urban settings. It is our judgement that in such circumstances, a more nuanced approach to reviewing the metric is appropriate, judging the Site by the merit of its habitat creation measures that have been designed to be appropriate for the Site's setting, rather than relying on proxy figures alone, that are based on an extremely generalised approach that has attempted to assign value to all habitats across England, regardless of location, connectivity and setting.

Other Enhancement Measures

As previously stated, faunal enhancement measures such as bat, bird and insect boxes are not captured within the metric, but are of ecological value yet this is disregarded within the BNG context. Such measures were typically valued by LPA ecologist as they allow enhancements for more mobile species, that are not reliant on habitat in the immediate vicinity, yet now these important ecological additions are being overlooked at a local basis. It is also important to emphasise that Natural England Biodiversity Metric 4.0 User Guide, does state para 1.5.5 '*The metric and its outputs should be used alongside ecological expertise as part of the evidence that informs plans and decisions*'.

The proposals include re-seeding retained grasslands in the north of the Site with an appropriate species-rich native grassland seed mix, that will be tolerant of the more shaded location proposed following tree planting. This will lead to an increase in the sward diversity of the retained grassland and it is proposed that management of this area will be relaxed to no more than two cuts per year, to allow a more varied sward structure to establish. This is clearly an ecological benefit that will boost botanical diversity onsite, specifically for nectar feeding invertebrates, however due to the crude multipliers within the metric this enhancement is not captured by Natural England's metric in any way. This illustrates how the metric is a proxy only for biodiversity and in many cases is not sophisticated enough to capture a range of ecological enhancements.

It is recommended that again, a more nuanced approach is taken to recognising such enhancements, applying professional ecological knowledge rather than relying solely on very generalised proxy figures within the metric, as this is how the metric was meant to be used, as a tool.

Conclusion

It is our view that the scheme has now arrived at a point where it is compliant with policy. It is important to note that currently in Reading there is no specific net gain policy beyond that translated from the National Planning Policy Framework into Policy EN12, which states that on all sites, development should not result in a net loss of biodiversity and geodiversity and should provide a net gain for biodiversity wherever possible (our emphasis). The Policy sets out that in exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it's demonstrated that the impacts cannot be 1) avoided, 2) mitigated or 3) compensated on-site, then new development will provide off-site compensation (our emphasis) to ensure there is no net loss. The main element of the policy (as described by Paragraph 4.2.55) is the need to provide an interconnected 'Green Network', of which this Site clearly does not form due to the lack of habitats within the urban and commercial dominant landscape

As has been discussed previously, the Site is considered **not** to form an IEF or a stepping stone habitat, it is isolated with common and widespread species typical of amenity grasslands that are subject to regular intensive management. In the context of EIA the Site is not of biodiversity/ecological interest, which outside the operational constraints of the BNG metric, these habitats would not pose a constraint to the proposals. Their loss would therefore not be in breach of this policy. It is therefore not proportionate to suggest that the scheme should be refused based on the losses of low-quality grassland with very limited species diversity or interest and the losses of trees that was entirely outside of our client control, having been removed by the previous owners of the Site.

Despite this, a metric assessment has been completed (though technically at this stage there is not a strict legal or policy requirement for this) and this has demonstrated the challenges with achieving a gain onsite. Many of the mitigation and/or enhancement opportunities either are not captured by the metric, or are heavily penalised due to the crude and highly generic nature of the multipliers used by the metric. Ecological enhancement measures have been further designed into the Site in order to maximise diversity in a proportional way considering the limited quality of habitats lost, resulting a loss of 0.64 habitat units on-site. A gain using the metric has still been sought through providing sums to RBC for additional off-site tree planting; it is suggested that eight medium-sized trees would be planted off-site to compensate for the on-site loss, creating a 10.52% total change in habitat units. This tree planting can be provided in a more appropriate and strategic location as determined by RBC, where they can be better connected to other habitats and can contribute more to landscape scale ecological habitat creation/enhancement than could ever be achieved in the highly isolated location of the Site.

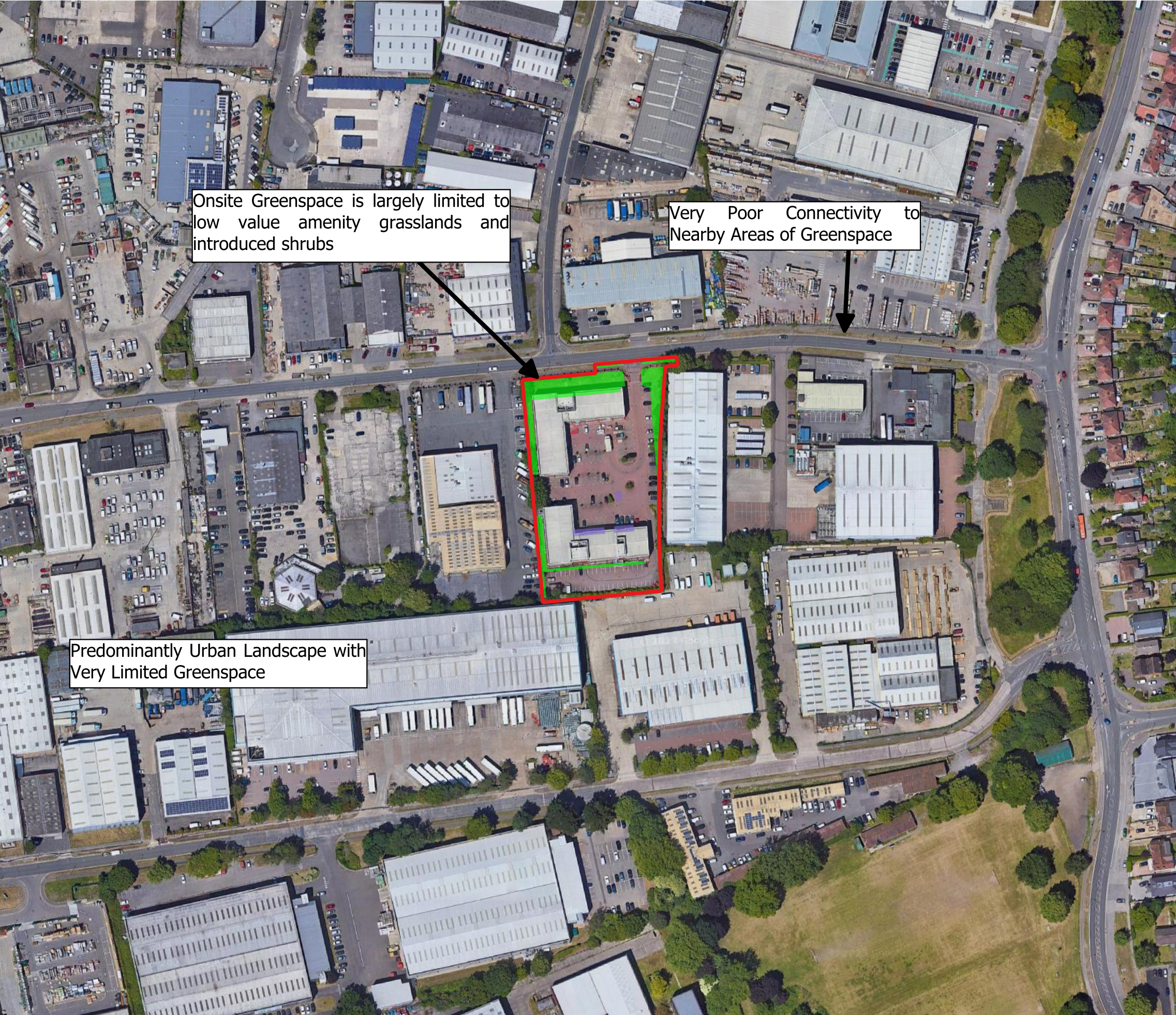
It is therefore our expert opinion that the scheme is policy compliant and will lead to an overall betterment for biodiversity, beyond that being demonstrated by Natural England's biodiversity metric.

The approach set out is considered to be proportionate to the low ecological value of the Site, and offsite contributions to tree planting will further better the scheme potential to deliver benefits for biodiversity.

Yours sincerely,



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FPCR Environment and Design Ltd
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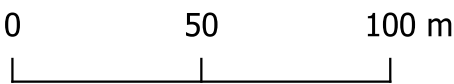


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Key

- Red Line Boundary updated 06.01.2023
- Introduced shrub
- Modified grassland



client
Coltham

project
Bennet Court, Reading

drawing title
Site Context Plan

scale @ A3
1:2,000

drawn
OGJ

issue date
20/7/2023

Figure 1



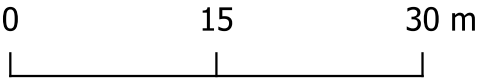
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Key

- Red Line Boundary
- Biodiverse green roof
- Developed land; sealed surface
- Intensive green roof
- Introduced shrub
- Modified grassland
- Hedge Ornamental Non Native
- Native Hedgerow
- Native Hedgerow with trees
- Native Species Rich Hedgerow
- Proposed Medium Trees
- Proposed Small Trees



client
Coltham Developments Ltd.

project
Bennet Court,
Reading

drawing title
Proposed Habitats

scale @ A3
1:550

drawn
DS / CHK

issue date
21/7/2023

Figure 2