

David Brett

Planning Officer
Reading Borough Council
Civic Offices
Bridge Street
Reading
RG1 2LU

Our reference: LUS2224_BNG_Letter

Date: 11/08/22

Dear David,

**Biodiversity Net Gain and Ecological Enhancement - Planning
application ref: 220413 Land to the Rear of 104 Berkeley Avenue Reading
RG1 6HY**

Introduction

This letter sets out the applicants' commitments to ecological enhancement at the above Site. The enhancements proposed consider the commentary from Reading Borough Council along with National and Local Policy on Biodiversity Net Gain. The assessment within this report is cognisant of various relevant guidelines^{1,2,3,4}.

Experience

This letter and associated assessment were undertaken by Greg Nightingale MCIEEM. Greg has been working as an ecologist within the planning and development sector for over eight years. He has surveyed, reported on, and designed mitigation and compensation for many residential and commercial developments. He is a full member of Chartered Institute of Ecology and Environmental Management (CIEEM), and he was previously a committee member of the CIEEM Southwest member network for three years.

Greg has been working on Biodiversity Net Gain (BNG) since 2016, prior to its inclusion within the National Planning Policy Framework (2018 revision) and the pending Environment Act 2021. He has established and developed BNG systems and processes in three small to medium sized ecological consultancies and is highly experienced in the application of BNG at the site and local level, including delivering BNG offsetting and contributions via S106 Agreements and third parties.

From 2019 – 2021, in a former role, Greg supported Bromley Council and Newham Council with ecological advice to assist in determining residential and commercial planning

¹ CIEEM (2017). *Guidelines for Preliminary Ecological Appraisal. 2nd Edition*. Chartered Institute for Ecology and Environmental Management, Winchester.

² CIEEM (2018). *Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal and Marine*. Chartered Institute for Ecology and Environmental Management, Winchester.

³ BSI (2013). *BS 42020:2013: Biodiversity – code of practice for planning and development*. British Standards Institution, Bristol.

⁴ Panks S., White N., Newsome A., Nash m., Potter J., Heydon M., Mayhew E., Alvarez M., Russell T., Cashon C., Finn G., Scott S.J., Heaver M., Scott S. H., Treweek J., Butcher B., and Stone D. (2022). *Biodiversity Metric 3.1: Auditing and accounting for biodiversity – User Guide*. Natural England, York.

applications. Using his firm understanding of current legislation and planning policy, Greg assessed ecological planning submissions and delivered concise and pragmatic advice, enabling these councils to discharge their duties as decision makers.

Commentary to Date

Commentary from Reading Borough Council to date, can be summarised as:

- A requirement to deliver Biodiversity Net Gain using the Defra 3.1 metric
- A requirement for Biodiversity Net Gain to be based upon the post development baseline, including consideration of the following habitats which have been alleged to of been removed to facilitate the development:
 - A hedgerow
 - Scattered tree removal
- Mammal gaps at the bases of new fences

Biodiversity Net Gain Principle 6

Principle 6 of the Defra 3.1 Biodiversity Net Gain Metric is of importance during the consideration of this letter and the proposed ecological enhancements. Principle 6 reads as follows:

“The metric is designed to inform decisions, not to override expert opinion. Management interventions should be guided by appropriate expert ecological advice and not just the biodiversity unit outputs of the metric. Ecological principles still need to be applied to ensure that what is being proposed is realistic and deliverable based on local conditions such as geology, hydrology, nutrient levels, etc. and the complexity of future management requirements.”

Ecological Commitments

The applicant has committed to delivering the following ecological compensation and enhancement:

- One Schwegler 2FR bat tube (or equivalent), built into the fabric of the building's southern elevation (eastern extent)
- Two raised ridge tiles along the main ridge of the new building
- Two general purpose WoodStone bird boxes (or equivalent), installed on the new building
- The provision of a new native hedgerow along the north and east boundaries of the Site.
- The provides of two new native trees

With the above commitments, habitats will be replaced, and green infrastructure will be re-linked / provided within the Site along with specific measures for common and widespread protected species.

Enforcement and Planning Control

The extent and nature of the commitments proposed are reasonable and proportionate to the historic and proposed impacts of the Proposed Development. The applicant is willing to commit to these measures via their embedment into design, along with a planning condition, which ensures their delivery. These measures can be secured via a planning condition linked to a 'prior to occupation' trigger.

Based on the above, the applicant will have delivered reasonable ecological compensation and enhancement for such a scheme in a manner which is enforceable by Reading Borough Council.

Whilst a Defra 3.1 Small Sites Metric could be undertaken, it is reasoned in line with Principle 6 above and the principles of proportionality, this would be overly onerous for such a scheme. With the above commitments, the habitats lost are replaced, and common and widespread species are provided for.

Kind regards,



Greg Nightingale BSc (Hons) MCIEEM
Director, LUS Ecology

