

BENNET COURT, READING (REFERENCE: 221936)

RESPONSE TO ECOLOGY COMMENTS

1.0 Executive Summary

- 1.1 Following the submission of the application for industrial development at Bennet Court, Reading, comments have been made by various 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)).
- 1.2 The Local Plan sets out 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 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'.
- 1.3 In this instance, given the specific circumstances, the proposed meets with the mitigation hierarchy, however the below remains important to consider:
- The existing buildings, which lie within an employment area, are no longer suitable because:
 - The building are old and no longer suitable for modern employment needs
 - The market requires high standards of building in terms of sustainability credentials
 - The area is more suited to industrial uses rather than offices
 - There is a reasonable fallback in the form of prior approval for the conversion to residential (which is not preferable in policy terms given the location and potential loss of employment).
 - The proposed scheme would provide extensive benefits:
 - A modern building that is specifically designed to meet market requirements for the location
 - The proposed building has been designed to ensure minimisation of carbon, and is therefore designed to achieve BREEAM Outstanding and an EPC rating of 'A+' (an improvement on the current building)
 - The proposed development would have a positive, beneficial impact upon the existing strategic highway network, resulting in a reduction in 51 two-way journeys per day.
 - Maximisation of habitat and biodiversity within the Site, whilst still allowing for market requirements.
 - From an ecological perspective, the value of the existing Site is considered less than the proxy values contained displayed by Natural England Biodiversity metric:
 - The metric is a proxy for measuring biodiversity, not an appropriate tool for measuring ecological value.

- The onsite grasslands are considered to be of low ecological value due to the common and widespread sward that dominates it, with poor connectivity to similar habitats outside the boundary.
- The scheme includes a range of ecological enhancements that are not all captured within the metric appropriately.

2.0 Introduction

- 2.1 A Full Planning Application was submitted to Reading Borough Council on 28th December 2022 (Reference: 221936) for the:

'Demolition of existing buildings and erection of one industrial building for flexible industrial processes (Use Class E (g) (iii), General Industrial (Class B2), or storage or distribution (Class B8) uses with ancillary offices, and all other ancillary and enabling works including altered access, on-site parking, landscaping, drainage, engineering and boundary treatment works.'

- 2.2 As part of the consultation process, Ecology comments were received on 28th February 2023 from Cathy Holwill (the Council's Ecology Officer), attached at **Appendix 1**, which outlined the following key issues:
- Details of the surveyors who carried out the bat roost assessment, start and end times, locations of surveyors, details of the weather conditions etc.
 - Bat survey to be carried out between May and September.
 - Demonstration that there are no suitable alternatives to the loss of biodiversity net gain.
- 2.3 Comments have also been received from Sarah Hanson (Natural Environment Officer) which relate to BNG, and off-site mitigation being the last resort and the need for adequate landscaping to mitigate tree loss. In addition, the LLFA have provided comments which relates to SUDs provision maximising ecological benefits.
- 2.4 Consequently, this note addresses the biodiversity options explored and additional landscaping incorporated, whilst taking consideration for the wider associated benefits the proposed development would generate.

3.0 Policy Considerations

- 3.1 Section 38 (6) of the Planning and Compulsory Purchase Act 2004 states that where the development plan contains relevant policies, applications for development which are in accordance with the plan should be allowed unless material considerations indicate otherwise.

Local Planning Policy

- 3.2 Policy EN12 (Biodiversity and The Green Network) (set out in Appendix 2) of Reading's Local Plan (2019) 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.' Furthermore, Policy EN12 continues to stipulate that 'in exceptional circumstances, where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts

cannot be avoided, mitigated or compensated for on-site, then new development will provide off-site compensation to ensure that there is no net loss of biodiversity.

- 3.3 Paragraph 4.2.63 associated with Policy EN12 re-confirms the overall principle being there should be no net loss of biodiversity, and a net gain, as supported by the NPPF, where it can be achieved. Paragraph 4.2.63 continues to state that a mitigation hierarchy approach will be used to consider the loss of on-site biodiversity and where there's exceptional circumstances, where the benefits of the development outweigh the loss, and where the mitigation hierarchy has been followed, off-site compensation may be acceptable.
- 3.4 Policy EN14 of Reading's Local Plan (Trees, Hedges and Woodlands) sets out that individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. In addition, new development shall make provision for tree retention and planting within the application site.
- 3.5 Policy EN18 (Flooding and Sustainable Drainage Systems) states that wherever possible, SUDs provision should maximise ecological benefits, link into the existing Green Network, incorporate tree planting and landscaping and avoid damage to existing significant trees, including through changes to the site hydrology.
- 3.6 In addition, Reading's Section 106 Planning Obligations SPD (2015) sets out that Section 106's will be used for ecological mitigation/remediation required as a result of a specific development scheme and providing for appropriate biodiversity mitigation and compensation.

National Planning Policy

- 3.7 Paragraph 190 sets out that when determining planning applications, if significant harm to biodiversity resulting from a development cannot be avoided, adequately mitigated, or as a last resort, compensated for, then planning should be refused.

4.0 Existing Buildings

- 4.1 The Council have suggested that the retention of the existing buildings would be preferable in terms of biodiversity. The Local Plan allocates the Site as part of a Core Employment Area and we consider that the retention of the building is unfeasible given:
 - The existing buildings are not suitable for employment purposes, with regards the need to meet modern standards. Furthermore, the market advice from JLL and Logix sets out, that due to the building's structural make up, they have little occupier appeal.
 - In addition, there is also a reasonable fallback position¹, with regards the extant prior approvals on the site, for change of use from Class B1(a) to C3, allowing for 55 flats to occupy the site. This conversion would be movement away from the site's allocated, intended use for employment purposes, situated within one of Reading's industrial estates.

¹ Noting that the Council have now introduced an Article 4 across the Bennet Court industrial estate area, this demonstrates that the Council want to prevent further changes of use to residential dwellings in this area, and therefore maintain existing employment sites.

- 4.2 As such, the retention of the existing building is unfeasible and its redevelopment in line with the aspirations of the Local Plan is the best option.

5.0 Proposed Building

- 5.1 As set out above, the redevelopment of the Site within the Core Employment Area for modern employment uses is supported. In order to provide maximum benefits, the scheme has been designed in a specific way. This is because:

- The proposed development has been designed to be market facing, in order to address the need for the proposed building and associated size. The market advice has set out that demand is for Grade A/Grade B refurbished space, where the offering includes a high level of ESG provision including car charging points and PV/solar panels.

- 5.2 In addition to this, the proposed building would also provide a number of other benefits against the existing situation:

- *Highway Benefit:* The proposed building will improve the existing highway position, specifically in relation to traffic generation. The proposed development would lead to a reduction in vehicle movements throughout the day, specifically 21 two-way vehicle trips in the morning and 30 two-way trips in the evening, equating to *51 two-way vehicle trips per day*.
- *Carbon Benefit:* As set out above and within the market evidence, the current building is not fit for purpose. However, the proposed building has been designed to be capable of achieving an 'Outstanding' rating under BREEAM Assessment Scheme. Furthermore, the development is designed with an enhanced building fabric to improve thermal performance. Consequently, the scheme will achieve a minimum EPC rating of 'A', although a rating of 'A+' will be targeted.

6.0 Ecological Considerations

- 6.1 In addition to the above, it is considered that there are a number of considerations relating to the habitat on the Site and how this is calculated.

- 6.2 Natural England's Biodiversity Metric is a blunt tool for measuring biodiversity value using proxy figures. In many cases, very broad habitat descriptions are used that often are not influenced by specific species compositions. In the example of modified grassland (which dominates the current greenspace on Site) the limited requirements are that it is dominated by palatable grasses and the range of species included are very common and widespread; thus not fully representative of valuable habitats from an ecological perspective.

- 6.3 Furthermore, the condition assessment criteria are similarly broad. For modified grasslands, six species per m² are all that is required to achieve the non-negotiable criteria for this habitat – regardless of species composition. In examples such as the grassland present on site, this is to be expected, as urban grasslands are often subject to a level of disturbance that allows tolerant species such as large plantain *Plantago major*, white clover *Trifolium pratense* or creeping buttercup *Ranunculus repens* to establish, thus increasing the species content. Other example criteria include scrub and bracken having <10% and 20% percentage cover respectively and the

sward height being varied (again with easily achievable heights of part of the sward being >20cm and others less than 7cm). It is entirely expected that such grassland as those present on site will achieve a 'good' condition, but these are not considered to represent an example of a 'good' ecologically valuable habitat. Consequently, it is our view that the metric will often result in a high baseline figure for such urban sites, based upon frequently disturbed existing grassland.

- 6.4 Furthermore, certain enhancements won't be captured by the relatively crude criteria within the metric for modified grassland. For example, the proposals have now been amended to include native species rich seed sowing to replace the frontage grassland including a range of shade-tolerant species which will thrive under new individual tree planting. This is considered to be an enhancement that will boost the botanical diversity of the grassland, but this will not be captured by the simple criteria that just requires 6 species per m².
- 6.5 However, our client's Ecologist (FPCR) have explored all options in order to achieve on-site biodiversity net gain. As such, the amended layout represents an opportunity to achieve a net gain for both habitat units and hedgerow units.

7.0 Proposed Amendments

- 7.1 Notwithstanding the above, it is acknowledged that habitat creation on site needs to be maximised. As such, the below amendments have been made to the scheme:
- Retained grassland will be enhanced through the introduction of a native species-rich seed mix to the north-east and the introduction of more favourable management regime.
 - Grassland along frontage will be replaced with native species rich seed mix.
 - Additional tree planting along the frontage of Bennet Road.
 - Native shrub planting to include a range of flowering and fruit bearing specimens.
 - Native hedge planting.
 - Bat, bird and invertebrate features (the value of these are not captured by the metric).
 - Green roof on the cycle store facility.

8.0 Conclusion

- 8.1 In summary, Policy EN12 of Reading's Local Plan sets out that '*development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible.*' Furthermore, Policy EN12 outlines that in exceptional circumstances, where the need for the development outweighs the need to protect the site, and it is ***demonstrated that the impacts cannot be avoided, mitigated or compensated for on-site, then new development will provide off-site compensation to ensure that there is no net loss of biodiversity.*** Consequently, Policy EN12 does set out that where the impact cannot be avoided, mitigated or compensated for on-site, off-site compensation is adequate to enable no net loss.
- 8.2 Following further work by our client's Ecologist, FPCR, additional landscaping has been incorporated to the design and layout of the site, in order to achieve a Biodiversity Net Gain on-site of +7.95% habitat units and +2.67% hedgerow units. As such, the proposed development complies with Policy EN12.

- 8.3 Policy EN18 states that '*where possible, SUDs provision should maximise ecological benefits,*' however due to the nature of this site and the building footprint requirement in line with market need, it is not possible to do so. Thus, noting the Policy's reference to '***where possible,***' it is not possible to do so and has been demonstrated throughout as to why.
- 8.4 This response sets out why the existing building is insufficient to serve its' purpose for future employment use, in-line with the site's allocation, and hence the need for redevelopment of the site, to ensure a sufficient, market facing, sustainable building can be accommodated to provide long term economic sustainability for the site.
- 8.5 In addition, Natural England's Biodiversity Net Gain Metric is restrictive and has limitations, as presented, which impacts upon the baseline BNG calculation for the site. Notwithstanding this, additional landscaping has been provided, in order to ensure that there is no net loss of biodiversity have been set out, ensuring accordance with Policy EN12.
- 8.6 Alternatively, the extant consent for the site will be pursued, which would result in the loss of employment land, and introduce a residential element within an existing, wider industrial estate.

Appendix 1 – Ecology Comments

Memo

To: Jonathan Markwell

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 28 February 2023

Re: Application ref: 221563

Address: Bennet Court Bennet Road Reading RG2 0QX

Description: Demolition of existing buildings and erection of one industrial building for flexible industrial processes (Use Class E (g)(iii)), general industrial (Class B2) or storage or distribution (Class B8) uses with ancillary offices, and all other ancillary and enabling works including altered access, on-site parking, landscaping, drainage, engineering and boundary treatment works.

The application site is an area of land in a predominantly light industrial area of South Reading. It comprises two large two storey detached office buildings surrounded by hardstanding, hedges and some ornamental planting. It is proposed to demolish the existing buildings and remove ornamental shrubs, grassland, hedgerows and a line of trees, to allow the construction of a warehouse and offices with associated parking, hardstanding and soft landscaping.

An Ecology Report from FCPR has been submitted with the application. This includes a bat roost assessment of the two buildings which were assessed as having moderate suitability to host roosting bats. Two bat emergence/ re-entry surveys were carried out on consecutive days at the end of September (outside the bat survey season) and the report states “*it is considered that the buildings are unlikely to be used as a bat roost*” The report does not provide details of the surveyors who carried out the survey, start and end times, locations of surveyors, details of the weather conditions etc and has therefore not been produced in accordance with the Bat Conservation Trust’s bat Survey Guidelines.

Bat Conservation Trust’s Bat Survey Guidelines state that to determine the presence or absence of bats where the building has been assessed as having “moderate” suitability for use by roosting bats (as is the case here) two dusk emergence / pre-dawn re-entry bat surveys need to be carried out. Surveys need to be carried out between May and September, with at least one taking place in the optimum period of May to August (inclusive), and with at least one being a pre-dawn survey.

As such, at present there is insufficient information for the council to determine this application. A bat survey report, produced in accordance with the Bat Conservation Trust’s Bat Survey Guidelines will need to be submitted before this application can be determined or alternatively the application would need to be refused on the grounds that insufficient information has been provided to determine the likely impact of the proposals on bats. Further details are given below:

Planning policy and legislation

All species of bats receive special protection under UK law and it is a criminal offence under the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2010 (The Habitat Regulations), deliberately or recklessly to destroy or damage their

roosts, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from the Statutory Nature Conservation Organisation (the SNCO - Natural England in England).

If a bat roost will be affected by the works, a licence for development works affecting bats (i.e. for derogation from the provisions of the Habitat Regulations) will need to be obtained before works which could impact upon the roost can commence. This involves submitting a licence application to Natural England with a detailed mitigation plan informed by surveys undertaken in accordance with national guidelines.

Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (this document has not been revoked by the National Planning Policy Framework) states that:

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.”

In this case, since 1) the extent to which bats (which are a protected species) may be affected by the proposals has not been established, and 2) there appear to be no “exceptional circumstances”, the application would not be in accordance with the above planning policy.

Further survey requirements

The Bat Conservation Trust’s Bat Survey Guidelines state that to determine the presence or absence of bats where the building has been assessed as having “moderate” suitability for use by roosting bats (as is the case here) two dusk emergence / pre-dawn re-entry bat surveys need to be carried out. Surveys need to be carried out between May and September, with at least one taking place in the optimum period of May to August (inclusive), and with at least one being a pre-dawn survey.

Biodiversity Net gain

The development will lead a biodiversity net loss of -76.79%. The report states:

Options including the installation of a green roof on the building, retaining more of the existing grassland on the site, creating further areas of grassland on the site, and creating grassland in favour of introduced shrub planting were explored. However, it was concluded following these investigations that the proposed development does not have the capacity to result in a biodiversity net gain in terms of habitats.

Paragraph 180 of the NPPF (2021) states:

When determining planning applications, local planning authorities should apply the following principles:

- a) 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;*

And EN12 of the Reading local Plan which reads:

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. Development should:

Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and

Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development. [...]

A mitigation hierarchy approach, as set out in paragraph 118 of the NPPF, will be used to consider the loss of on-site biodiversity. In exceptional circumstances where the benefits of development outweigh the loss, and where the mitigation hierarchy has been followed, off-site compensation may be acceptable.

The proposals will lead to an outsize building and will lead to a large loss of biodiversity which, unless it could be demonstrated that there are no suitable alternatives, would not accord with the above policies. The council will need to decide whether the loss of biodiversity in this area of Reading is acceptable and if so, whether the loss of biodiversity will need to be addressed by off-site provision.

Appendix 2 – Policy EN12, Reading Local Plan

Biodiversity and the Green Network

EN12: BIODIVERSITY AND THE GREEN NETWORK

- a) *The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:*
- *Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and*
 - *Areas with potential for biodiversity value and which stitch the Green Network together - designated Local Green Space and open green spaces, and existing and potential Green Links.*

New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

- b) *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. Development should:*
- *Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*
 - *Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*
- In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development.*

4.2.54 Despite its primarily urban nature, Reading has a number of important wildlife habitats including woodlands, grasslands and wetlands. These are the remnants of a once much wider and more connected series of habitats that supported a greater diversity of species. As well as larger habitats, individual features of biodiversity interest can be present at a small scale within a variety of types of site. As set out elsewhere in this plan, there are significant needs for new development within Reading, but there is also a need to attain a balance between accommodating development activity, and preserving important biodiversity and geodiversity.

4.2.55 There are two main elements to this policy:

- Identifying the key areas of biodiversity importance and drawing them together into an interconnected ‘Green Network’ across Reading; and
- General development management guidance for all sites on biodiversity and geodiversity.

Existing features

4.2.56 Whilst there are no nationally or internationally designated habitats in Reading, the Borough contains many sites that are important to the local and strategic context, and therefore need to be protected. These include:

- Local Nature Reserves and Local Wildlife Sites: these are designated by the local authority, in the latter case in conjunction with Thames Valley Environmental Records Centre;
- protected and priority species and their habitats and habitats identified as being important within Reading’s Biodiversity Action Plan (BAP);
- Biodiversity Opportunity Areas: these are those focus areas identified by the Berkshire Nature Conservation Forum and agreed by the South East England Biodiversity Forum (SEEBF), where biodiversity improvements are likely to have the most beneficial results at a strategic scale. Two BOAs cross into Reading Borough - the West Reading Woodlands and LNRs, and the Kennet Valley East (see Figure 4.4). The BOA designation identifies priorities for enhancement. The priorities for the areas in Reading are available to view on the Berkshire Local Nature Partnership website⁴⁸, and, for these areas and for adjacent development, biodiversity enhancements under this policy should reflect those priorities.

4.2.57 The Council will manage LNRs and LWSs, to ensure that they remain protected against the adverse effects of development or related activity. It should be noted that the above designations are defined outside the Local Plan process, which means that they are potentially subject to change within the plan period, and the adopted Proposals Map may not show the latest boundaries. The Council, together with Natural England, the Berkshire Nature Conservation Forum (BNCF) and Thames Valley Environment Records Centre (TVERC), will continue to keep LWSs and LNP under review. BNCF will also keep the priorities for Biodiversity Opportunity Areas under review.



4.2.58 As well as the need to protect existing biodiversity value, this policy hinges on the concept of a ‘Green Network’. This stitches together the known areas of biodiversity importance with areas where there is potential for increased

Figure 4.4: Biodiversity Opportunity Areas in Reading

⁴⁸ <http://berkshirelnp.org/index.php/what-we-do/strategy/biodiversity-opportunity-areas>

biodiversity significance into a network that allows wildlife to move between sites. This seeks to overcome the issue that sites of wildlife importance have become fragmented into a number of small, unconnected sites with isolated wildlife populations. Climate change is likely to increase the need for linkages, as species will increasingly need to move across the landscape to stay within their climatic range. The Green Network also fulfils other purposes such as storm water control and air pollution amelioration.

- 4.2.59** The Green Network incorporates both the existing designated areas already set out, but also areas with potential for biodiversity value and movement. It has been identified through a desk based study using GIS data held by TVERC and Reading Borough Council. The study was carried out by TVERC. This Green Network policy goes beyond site specific considerations and is aimed towards the broader context acknowledging that for these areas to achieve their true value and potential they need to work as part of a network with one area being successfully linked to another area, rather than remaining as isolated fragments. Therefore, its interconnectedness is critical.
- 4.2.60** Given the importance of the interconnectedness of the Network, new and potential ‘green links’ are crucial. These lie between assets both within and outside the Borough and either link these areas or have the potential to do so (e.g. through re-development or management). They include both public and private land, and may include lines of trees, riverbanks, road and railway verges, a series of well vegetated gardens, stepping stones of small patches of habitat, green roofs or watercourses and ponds, or other similar features.
- 4.2.61** The routes identified as Green Links on the Proposals Map either denote an existing link or illustrate an indicative location for where potential Green Links could be located to provide desired connectivity for wildlife between ecologically important areas. It should not necessarily be interpreted as a precise line, rather it may indicate an indicative potential connection between areas. In practice, most Green Links shown on the map are a mixture of existing and potential links, i.e. whilst there are existing aspects that contribute to the Network there is also significant potential for development to make a further contribution to improve the Network. There is therefore little difference in how existing and potential links should be treated in terms of the policy. Green Links do not mean or imply public access.
- 4.2.62** Opportunities will be sought in conjunction with development proposals, to enhance the quality and integrity of the Green Network. Proposals should seek ways to enhance and restore biodiversity and geology, and enhance the quality and integrity of sites (where appropriate), by maximising the inclusion of biodiversity and nature conservation features, as part of good design, and by locating those features carefully to best contribute towards the interconnectedness of the Network. In addition, it must be clearly demonstrated that such measures will be effectively managed and maintained, to a high standard, over the lifetime of the development, through the mechanism of landscape and ecological management plans agreed in writing by the Council.

General Considerations

- 4.2.63** As well as those habitats already defined, there are many undesignated sites where there may be important biodiversity interest. The overall principle here is that there should be no net loss of biodiversity, and a net gain, as supported by the NPPF, wherever it can be achieved. Ecological information supplied should be in accordance with the British standard for biodiversity management, BS42020. A mitigation hierarchy approach, as set out in paragraph 118 of the NPPF, will be used to consider the loss of on-site biodiversity. In exceptional