

19 May 2021

NOTE FOR INQUIRY – BIODIVERSITY NET GAIN

APP/13A Proof of Evidence – David West – Ecology

Sandleford Park, Newbury

1.0 Introduction

Following the Trees, Woodland and Biodiversity roundtable session held across 12-13 May 2021, a Note for Inquiry was requested to clarify several points in relation to Biodiversity Net Gain. These were:

- The Council's position on the inclusion of irreplaceable habitats within the Biodiversity Net Gain Assessment;
- The Appellant's position on the same, in light of additional correspondence between the Council's Expert Witness and Natural England;
- The apparent absence of Slockett's Copse West and a patch of Purple Moor Grass and Rush Pasture from plans accompanying the Biodiversity Net Gain Assessment (CD10.14 Appendix B).

This note has been prepared by David West MEnv Sci CEnv MCIEEM.

2.0 The Council's Position on Irreplaceable Habitats in Biodiversity Net Gain

As set out in the Proof of Evidence (CD11.10) and Rebuttal Proof of Evidence (CD11.17) prepared by Susan Deakin BSc MSc CMLI, the Council's position is that irreplaceable habitats (which include Ancient Woodland) should not be included within biodiversity net gain calculations, whether or not there would be an adverse effect on the habitat.

The council provide a number of documents to support this position including CD17.13 and ID23. Following the roundtable session, an additional document (ID45) has been provided, comprising email correspondence between Susan Deakin and Nicholas White of Natural England.

3.0 The Appellant's Position on Irreplaceable Habitats in Biodiversity Net Gain

Having reviewed Mr White's correspondence in combination with existing guidance, and having taken further advice from the Chartered Institute for Ecology and Environmental Management (CIEEM) I agree with Ms Deakin's interpretation – i.e. the irreplaceable habitats should be excluded from the biodiversity net gain calculations in all cases.

As I explained during the roundtable session, the result of this is that the appeal scheme will deliver a higher percentage gain in habitat units. This is set out in a revised Biodiversity Net Gain Assessment (Revision V3) which shows a 48.93% gain in habitat units. Following correspondence between Ms Deakin and myself, it is agreed that the non-ancient woodland components (Gorse Covert and part of Waterleaze Copse) should be included within the assessment.

3.0 Slocketts Copse West and Purple Moor Grass and Rush Pasture

As highlighted by Ms Deakin, Slockett's Copse West and a patch of Purple Moor Grass and Rush Pasture are not shown correctly on Figures 2 and 3 of the Biodiversity Net Gain Assessment (CD10.14 Appendix B).

As I explained during the roundtable session, this is a mapping error, which appears to have been caused by a discrepancy in the underlying geodatabase. The exact cause of this is unclear as the

shapefiles are displayed correctly on other plans (e.g. CD22.32 Figure 1 and CD10.14 Appendix A, Figures 1 – 13). There is no material impact on the outcome of the assessment, however corrected plans are included as part of the revised Biodiversity Net Gain Assessment (Revision V3).