

Three Rivers District Council

Three Rivers Biodiversity Policy & Biodiversity Net Gain Update

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Council (if required)			

**POLICY AND RESOURCES COMMITTEE
10 JUNE 2024**

**Three Rivers Biodiversity Policy and Biodiversity Net Gain Update
(Director of Finance and Associate Director for Customer and Community)**

1 Summary

- 1.1 The purpose of this report is to outline the updated legislative duties of the Council under the Environment Act including: strengthened biodiversity duty and Biodiversity Net Gain.
- 1.2 The report recommends approval of the Three Rivers Biodiversity Policy, along with agreement on how and where to use the S106 Maple Lodge budget and an agreement in principle for Three Rivers to consider council land that could be a receptor site for off-site biodiversity net gains.

2 Context of Environment Act 2021

- 2.1 The Environment Act (the Act) received Royal Assent on 9th November 2021 to operate as the UK's new framework of environmental protection following the UK leaving the European Union. The Act strengthens the duty of public bodies to conserve and enhance biodiversity for example through Biodiversity Net Gain and Local Nature Recovery Strategies.

2.1.1 BNG is required under a statutory framework introduced by Schedule 7A of the Town and Country Planning Act 1990 (inserted by the Environment Act 2021). Its aim is to ensure that biodiversity is in a quantifiably better state post development by a minimum of 10%. The net gain in biodiversity can be created within the development site or on a donor site which then must be maintained for a minimum of 30 years. BNG applies to all development with some exceptions in place for example householder applications.

2.2 The act also strengthened the Biodiversity Duty on public authorities to conserve and enhance biodiversity. Public authorities were required to complete a first consideration for action that could be taken to benefit biodiversity by 1st January 2024 ([link to Three Rivers first consideration](#)). Following this, public authorities should review internal and external policies that impact biodiversity and then submit periodic reports.

3 Strengthened Biodiversity Duty

3.1 Section 102 of the Environment Act 2021 strengthens the duty on local authorities to consider what they can do to conserve and enhance biodiversity in England. This action will contribute to the achievement of national goals and targets for biodiversity as set out in the Environmental Improvement Plan, 2023.

3.2 As a local planning authority, the council will publish a biodiversity report detailing how the council is helping to improve the environment. The reports must include:

- A summary of the action taken within the previous period to comply with the duty.
- Actions taken to meet biodiversity net gain obligations.
- Details of biodiversity net gains resulting (or expected) from approved gain plans.
- Plans to comply with the duty and biodiversity net gain obligations in the next reporting period.

3.3 The first report should be completed before the 1st January 2026 and following this reports must be completed within 5 years of the previous report.

4 Three Rivers Biodiversity Policy

4.1 To comply with the strengthened biodiversity duty the council are required to review internal policies and procedures that could affect biodiversity.

4.2 The Three Rivers Biodiversity Policy is a new document for the council consolidating and aligning all council and local documents that have a focus on biodiversity.

4.3 This policy has been developed as an “umbrella policy” to set out the way in which the Council will manage and monitor Biodiversity across the district. It should be read in conjunction with the Council’s other policies, including the Three Rivers Local Plan Policies, Three Rivers Nature Recovery Strategy, Three Rivers Tree Strategy and the Three Rivers Climate Emergency and Sustainability Strategy.

4.4 Action plans of the relevant strategies will monitor and assess progress against their individual timelines. Each strategy will go through a periodic review process reporting progress on previous actions and setting new targets to benefit biodiversity.

4.5 The Biodiversity Policy will be reviewed in alignment with the production of strengthened biodiversity duty reports. These will be communicated throughout the council via the members information bulletin.

5 Biodiversity Net Gain Details

Local Plan link to BNG

5.1 Policy relating to biodiversity is currently set out in Policy DM6 Biodiversity, Trees, Woodlands, Watercourses and Landscaping of the Development Management Policies Local Development Document (2013). This policy was adopted prior to BNG becoming a legal requirement. As such, there is no requirement for BNG in the policy. The policy states that “*development should result in no net loss of biodiversity value across the District as a whole.*”

5.2 The policy goes on to set out requirements in more detail:

“Development must conserve, enhance and, where appropriate, restore biodiversity through:

- *Protecting habitats and species identified for retention*
- *Providing compensation for the loss of any habitats*
- *Providing for the management of habitats and species*
- *Maintaining the integrity of important networks of natural habitats, and*
- *Enhancing existing habitats and networks of habitats and providing roosting, nesting and feeding opportunities for rare and protected species.*

Linked habitats are important in allowing species to adapt and respond to circumstances. Development must not result in fragmentation or isolation of wildlife habitats and should seek opportunities for habitat connectivity with the wider landscape.”

5.3 The policy also considers specific requirements for trees, woodlands and landscaping that goes beyond biodiversity requirements.

5.4 BNG is covered in the Environment Act and supporting regulations and therefore the lack of reference to BNG in existing policy is not an issue. Development proposals required to provide at least 10% BNG are required to do so whether or not there is a local plan policy in place. The gain is calculated using the Government’s approved BNG metric. This is a spreadsheet that considers the location of the site, its existing baseline condition, and proposed condition based on habitat creation and enhancements proposed. It also considers off-site habitat creation where necessary, to calculate whether there is a net gain overall, and the amount of that gain.

5.5 Following the Regulation 18 consultation on the draft Local Plan in 2021 an updated ‘Biodiversity, Trees, Woodlands and Landscaping’ policy was agreed by the Local Plan Sub Committee in March 2022. This policy update incorporated the legal requirement for 10% BNG.

5.6 The Local Plan Sub-Committee will be considering any further amendments to Local Plan policies in the summer, and the ‘Biodiversity, Trees, Woodlands and Landscaping’ policy will be reviewed as part of this process.

5.7 It should be noted that BNG is a legal requirement and there isn’t a need to repeat what is already set out in law and government guidance, however, emerging Local Plan policies allow us to set out any local priorities and strategies that we would

require developers to take into account in delivering BNG. For example, locally important habitats are addressed in the draft 'Biodiversity, Trees, Woodlands and Landscaping' policy.

- 5.8 Hertfordshire County Council are preparing a Green Infrastructure Strategy and Local Nature Recovery Strategies (LNRS) which will help to target offsite BNG delivery and determine the 'strategic significance' score that is part of the biodiversity metric.
- 5.9 As such, a locally specific policy can help to ensure that BNG contributes to wider nature recovery plans in addition to local objectives. It can help ensure the right habitats are provided in the right places.
- 5.10 A consideration of planning policy could be going further than the 10% BNG. Officers would caution against this, as requiring more onerous BNG targets could result in other policy areas being affected. The most likely of these would be affordable housing for which it is acknowledged there is an ongoing pressing need in the district. Core Strategy Policy CP4 (affordable housing) makes it clear that in assessing affordable housing requirements, the financial viability of a scheme will be a relevant consideration in determining the amount, type and tenure mix of such provision. Any BNG targets going beyond 10% would need to be supported by appropriate evidence, including that the approach will be viable. The impact on viability of asking for more than 10% BNG is being tested through the Whole Plan Viability Study.
- 5.11 Hertfordshire County Council are still working on the LNRS, and this is unlikely to be ready in time to be fed into the Local Plan policy, therefore it may be more practical to prepare a separate BNG Supplementary Planning Document (SPD) following adoption of the Local Plan.

Planning Process

Validation Requirements

- 5.12 BNG now applies to most new major and non-major development under the Town and Country Planning Act.
- 5.13 Where applicants consider that the development would not be subject to the general biodiversity gain requirements, Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015 has been amended to require that the applicant must provide a statement as part of the planning application setting out why they believe this is the case.
- 5.14 The planning application form includes space for this statement. An applicant would be expected in this statement to set out what exemption(s) or transitional provision(s) apply to the development. In some cases, the exemption or transitional provision will be evident as they relate to the type of permission: the planning application form for household development already includes a pre-populated statement. In other cases, evidence may need to be provided.
- 5.15 Where development would be subject to the general biodiversity gain condition, the application must be accompanied by minimum information set out in Article 7 of The Town and Country Planning (Development Management Procedure) (England) Order 2015:
- a statement as to whether the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition;

- the pre-development biodiversity value of the onsite habitat on the date of application (or an earlier date) including the completed metric calculation tool used showing the calculations, the publication date and version of the biodiversity metric used to calculate that value;
- where the applicant wishes to use an earlier date, the proposed earlier date and the reasons for proposing that date;
- a statement confirming whether the biodiversity value of the onsite habitat is lower on the date of application (or an earlier date) because of the carrying on of activities ('degradation') in which case the value is to be taken as immediately before the carrying on of the activities, and if degradation has taken place supporting evidence of this;
- a description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations [2024]) on the land to which the application relates, that exists on the date of application, (or an earlier date); and
- a plan, drawn to an identified scale which must show the direction of North, showing onsite habitat existing on the date of application (or and earlier date), including any irreplaceable habitat.

5.16 If this information has not been provided, the Local Planning Authority (LPA) will be unable to validate the application.

5.17 Officers will need to consider the submitted information. It is anticipated support in assessing BNG will be provided by HCC LEADS but at this time, it is not known which applications Herts LEADS will have capacity to review and at what stage in the planning process. This information is currently being awaited.

5.18 It is also important to note that the changes brought about by Biodiversity Gain do not change the current planning application validation requirements or planning considerations relating to broader ecological considerations in respect of ensuring protection of protected species. These remain relevant, with the BNG considerations an addition.

Procedure following the grant of the planning permission (i.e. the Biodiversity Gain Condition)

5.19 Schedule 14 of the Environment Act 2021 amended the Town and Country Planning Act to set out that every planning permission granted for the development of land in England shall be deemed to have been granted subject to the condition that the development may not be begun unless a biodiversity gain plan has been submitted to the LPA, and the LPA has approved that plan.

5.20 The legislation sets out the matters the Biodiversity Gain Plan must specify. These include the pre- and post-development biodiversity value of the site, any registered offsite biodiversity gain or credits relied upon, and information about the steps taken to minimise the adverse effect of the development on the biodiversity of the onsite habitat and any other habitat.

5.21 The plan would be submitted to the LPA using the existing mechanism for the submission of details pursuant to planning conditions and would attract the same fee and 8-week target decision date, with the fee refundable if no decision is made within 12 weeks.

5.22 The LPA must approve the plan if satisfied that the pre- and post-development biodiversity values are as specified in the plan, that any off-site gain is correctly allocated, that any credits have been purchased and that the biodiversity gain objective (biodiversity value attributable to the development exceeds the pre-

development biodiversity value of the onsite habitat) is met. There is a right to appeal if the plan is not approved. At this time, whilst the full extent of input by Herts LEADS is unknown, it is anticipated that Officers will be wholly reliant on Herts LEADS to provide advice/guidance in respect of whether the submitted information is acceptable or not. Should HCC LEADS not be able to provide this service, we would need to procure advice from an ecologist and the use of additional external consultants is likely to be costly.

- 5.23 In addition to dealing with information submitted pursuant to the BNG condition, there may also be a requirement for a S106 agreement to be entered into where a development is required to secure significant on-site habitat enhancements. Any gains, and the necessary habitat management plans, along with monitoring requirements, must be secured for 30 years.

BNG S106 Agreements

- 5.24 BNG S106 agreements are entirely separate to S106 agreements which secure other heads of terms which are necessary to make the development subject of a planning application acceptable. Under a BNG S106, a land manager can sign an obligation with the LPA to commit to creating or enhancing habitats and managing those habitats for at least 30 years. Online planning guidance sets out that there are two types of legal agreement for BNG, the first is a S106 planning obligation and the second a conservation covenant. A Conservation Covenant is an agreement between landowners and a 'responsible body' (allocated by DEFRA, there are currently only five in the country). The land manager would need to provide detailed information on biodiversity habitat enhancements for the site, and the actions to be taken, and this can be provided and secured in the form of a Habitat Management and Monitoring Plan.
- 5.25 Obligations must be executed as a deed. LPAs are responsible for monitoring such agreements and enforcing to ensure the landowner meets their obligations and would register the obligation as a local land charge. Once land is secured for the creation/enhancement of habitats under this method, the land manager would then be able to sell the gains they have agreed to achieve in the form of units to developers.
- 5.26 The LPA will need to formulate a monitoring regime for such sites, to ensure they deliver what they have agreed to deliver. This is expected to rely on extensive input by ecologists as well as planners. It will be possible to charge for this and a new monitoring fee will need to be considered as an addition to our existing S106 Monitoring Charges (<https://www.threerivers.gov.uk/services/planning/section-106-agreement#Monitoring%20Charge%20for%20S106%20Agreements>)

TRDC Receptor Land

- 5.27 As a landowner Three Rivers have the potential for Council land to be a receptor site or habitat bank, meaning that developers requiring off-site BNG units could utilise Three Rivers land to deliver their BNG. To be eligible for this, the Council would need to assess the current condition of proposed land through a UKHab survey and condition assessment and register the land with DEFRA and Natural England as a biodiversity gain site. A legal agreement would then need to be in place to secure the land through either a S106 agreement or a conservation covenant. This would then make the council responsible for achieving the net gain and maintaining it for a minimum of 30 years.
- 5.28 The costs relating to creating the habitat improvements, maintaining the habitat for 30 years and the subsequent monitoring would be covered within the legal

agreement and fee for the biodiversity units paid by the developer who requires the offsite units to comply with their BNG. The cost per unit is market driven and would be set by the council to incorporate habitat creation, maintenance, and monitoring in addition to the administration.

- 5.29 Officers will bring proposals to the Climate Change, Leisure and Community Committee as and when opportunities for Three Rivers land to be used as a receptor site for a final decision.

6 Maple Lodge Section 106

- 6.1 A planning obligation was linked to the planning permission (LPA ref. 21/0573/FUL) for Maple Lodge for a biodiversity net gain contribution to be paid to the council on the commencement date (Appeal reference - APP/P1940/W/21/3289305). The total amount for the contribution, including indexation is £160,221. The council then have the discretion to use the contribution for habitat creation and enhancement on council owned land or pay the contribution to a third party to deliver locally.

- 6.2 Note: This planning permission was granted prior to Biodiversity Net Gain becoming mandatory, therefore, the process for this situation will differ.

- 6.3 The biodiversity net gain contribution should provide an area of species rich grassland in a location within proximity of the site which in the opinion of the council will deliver 11.9 biodiversity units (as per the Natural England biodiversity metric 2.0) and then manage and maintain this for 25 years.

- 6.4 If the council does not provide an area of species rich grassland within proximity of the site to the value of 11.0 biodiversity units (or arrange a third party to do this) within 5 years of receipt of payment, then the funds must be repaid to the owner.

- 6.5 Officers have identified grassland sites in proximity to the development site with the potential for ecological improvement. The next steps would be for these sites to be surveyed to gain a baseline of the habitat type, size and condition using the metric 2.0 to understand what would need to happen to deliver the biodiversity net gain. The sites being considered include: Beechen Wood, Coombe Hill Road, and Berry Lane & Mead Place. These three sites are currently being considered, once the ecological baseline surveys have been completed for each site there will be greater understanding of how much land will be required in order to create the 11.9 units.

- 6.6 Throughout the process, officers will ensure to keep the public informed through social media and the councils website.

7 Options and Reasons for Recommendations

- 7.1 The purpose of this report is to outline the updated legislative duties of the Council under the strengthened Biodiversity Duty as part of the updated Environment Act. The report also provides some guidance on how BNG will be handled as part of the planning application process, including initial identification of potential future resource implications in terms of the specialist input required for such applications and future sites.

- 7.2 The report recommends approval of the Three Rivers Biodiversity Policy, along with agreement on how and where to use the S106 Maple Lodge budget and an agreement in principle for Three Rivers to consider having receptor sites.

8 Policy/Budget Reference and Implications

- 8.1 The recommendations at points 18.1 and 18.3 in this report are within the Council's agreed policy and budgets.
- 8.2 The recommendations in this report relate to the achievement of the following objectives of the Corporate Framework 2023 – 2026:
 - 8.2.1 where people have access to good quality housing
 - 8.2.2 where local infrastructure supports healthy lifestyles and addresses health inequalities
 - 8.2.3 that takes action to mitigate and adapt to the climate emergency
 - 8.2.4 where local people, organisations and businesses benefit from the prosperity of the district
- 8.3 The impact of the recommendations on this/these performance indicator(s) is:
 - 8.3.1 The Council will comply with the obligations of current legislation – the Environment Act, 2021
 - 8.3.2 Developers will be able to operate within the District
 - 8.3.3 Biodiversity will benefit by 10%, there will be no net loss
- 8.4 The recommendations at points 18.2, 18.4 and 18.5 in this report are not within the Council's agreed policies. The report recommends the adoption of a new policy, along with an agreement in principle for the Council to be a receptor for BNG.

9 Financial Implications

- 9.1 At this current time there are no financial implications to the Council in agreeing the recommendations outlined in the report at section 18.
- 9.2 Initially, implementation will be managed within existing staffing resources and through charging a monitoring fee, to be agreed as part of the Council's Fees and Charges setting process. Should additional resources be required this will be brought forward as part of the normal budget process.
- 9.3 TRDC are in receipt of new burdens payments from Central Government as a result of the implications of BNG on Council resource. Initial payments since 21/22 have been for the implementation of BNG with the payments of approx. £26k in each of the last two years being paid retrospectively once we had evidenced the work that had been undertaken to implement BNG. Around 50% of the monies received has been paid to HCC (as replicated by other Herts LAs) for their setting up of a new service to support the planning application process with the remaining paid for Officer resource.
- 9.4 In 2024/25 the Government has committed a further new burdens payment of £26k, again to be paid at year end once Officers have demonstrated how this money has been used to implement the BNG requirements. It has not been confirmed how long the Government will continue with BNG new burdens payments.

10 Legal Implications

- 10.1 On-site gains may be secured by legal agreement, planning condition or conservation covenant (it would be for the LPA to determine the appropriate mechanism having regard to paragraphs 56-57 of the NPPF). Also the significance

of the site enhancements will be a relevant factor), off-site gains will necessarily be secured by Section 106 or a Conservation Covenant. The Council may also be approached by landowners in the District who are looking to provide biodiversity units by creating a habitat bank and selling them to developers in respect of developments which may be within and outside the district. The provision of such land-banks would need to be secured by Section 106. The Council would (irrespective of who the BNG units provided “belong” to), be the enforcing authority in the event of identified breaches of the Section 106. The Council may also in due course decide to become a provider itself, thereby promoting the delivery of BNG locally and that will require legal work. BNG units purchased within the district will attract a higher weighting so this could prove to be a popular option. There is also scope for developers to buy BNG credits via a national credit scheme to be run by Natural England. The attractiveness and future take-up of such schemes will have an effect on workloads.

- 10.2 It should also be noted that habitat enhancements delivering BNG will be required to be maintained for 30 years. Notwithstanding the use of a planning condition, the monitoring costs of that obligation will need be secured by Section 106 in any event (planning conditions cannot require the payment of money).

11 Equal Opportunities Implications

- 11.1 The content of the report are dictated by legislative requirements and there a no negative impacts from an equalities and diversity perspective.

12 Staffing Implications

- 12.1 The implementation of the Biodiversity Net Gain regulations are likely to have an impact within the development management, local plan and natural infrastructure teams with the need for input into planning applications within the required timescales and monitoring of s106 agreements.
- 12.2 Existing staff are likely to require additional training in order to be able to deal with the biodiversity element of planning applications. Herts LEADS are proposing a consultation service to provide resilience and consistency, any additional costs for this service will be reported through the usual budget process.
- 12.3 If the council makes sites available as receptor sites, depending upon the demand and our ability to absorb this demand, there may be an impact on the resources of the natural infrastructure team.
- 12.4 S106 monitoring fees will allow additional short-term resource to be brought in if required to support monitoring and enforcement of sites. If there is a longer-term impact on staffing resources this will be brought forward through the usual budget process.

13 Environmental Implications

- 13.1 The adoption and implementation of the Three Rivers Biodiversity Policy will help ensure the Council’s parks, open spaces, woodlands and nature reserves are managed to the highest environmental standards.
- 13.2 The various strands of the Policy will ensure that the natural world is protected within the District and is maintained and enhanced while delivering co-benefits for climate change mitigation and adaptation in-line with the Council’s Climate Emergency and Sustainability Strategy.

14 Public Health implications

- 14.1 A body of evidence is growing which explains the benefit people can experience from contact with the natural world; for example, increased prominence of social prescribing by clinicians for walking or gardening to alleviate symptoms.

<https://www.gov.uk/government/publications/state-of-the-environment/state-of-the-environment-health-people-and-the-environment>

- 14.2 Trees and greenery may boost lifespan, this has been studied for 8 years by Harvard researchers and published in April Environmental Health Perspectives.

<https://health.usnews.com/wellness/articles/2016-12-09/the-many-health-benefits-of-trees>

15 Communications and Website Implications

- 15.1 The relevant pages on the Three Rivers District Council website will be updated with all of the necessary information.

- 15.2 Additional communications will be considered as and when required as part of the Biodiversity Net Gain process.

- 15.3 Members will be kept updated via the Members Information Bulletin of any amendments or changes.

16 Community Safety/Customer Services Centre Implications

- 16.1 None-specific.

17 Risk and Health & Safety Implications

- 17.1 The Council has agreed its risk management strategy which can be found on the website at <http://www.threerivers.gov.uk>. In addition, the risks of the proposals in the report have also been assessed against the Council's duties under Health and Safety legislation relating to employees, visitors and persons affected by our operations. The risk management implications of this report are detailed below.

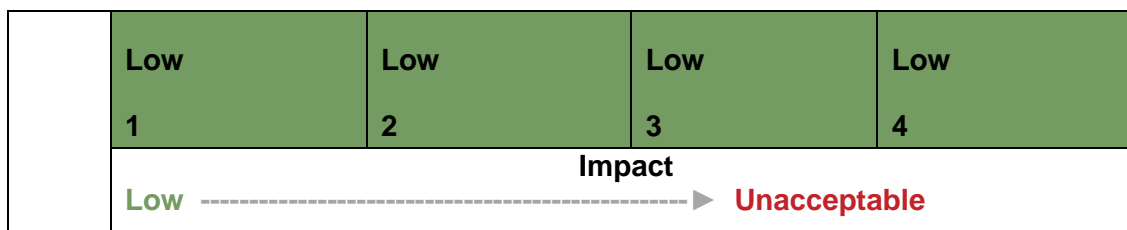
- 17.2 The subject of this report is covered by the Leisure and Natural Infrastructure Service Plan, Regulatory Services Service Plan, the Planning Policy and Conservation Service Plan and the Legal Elections and Democratic Services Service Plan. Any risks resulting from this report will be included in the risk register and, if necessary, managed within this/these plans.

Nature of Risk	Consequence	Suggested Control Measures	Response (tolerate, treat, terminate, transfer)	Risk Rating (combination of likelihood and impact)
The Council fails in its duties under the Environment Act.	Government intervention	Completion of the Biodiversity Duty Reports	Treat	3
The Council is unable to meet the legislative	Government intervention	Completion of the Biodiversity Duty Reports.	Treat	3

targets of the Act.		Implementation of BNG through the Planning process.		
Increased workload of Officers across the Council to deliver the requirements.	Staff unable to deliver legislative duties	Officers to monitor the impact and provide reports in due course. Cost recovery for specific aspects of BNG to be included as part of Fees and Charges.	Treat	3
Negative public perception from the Council in protecting and enhancing biodiversity.	Increase in complaints, negative press, damage to reputation	Completion of the Biodiversity Duty Reports. Implementation of BNG through the Planning process.	Treat	3
Negative Public Perception should the Council fail to fulfil its obligations under the Maple Lodge S106 Agreement	Increase in complaints, negative press, damage to reputation	Completion of the Biodiversity Duty Reports. Communications to the public on proposals and plans for the implementation of the BNG S106. Implementation of BNG through the Planning process.	Treat	6
Failure to monitor BNG and enforce as appropriate.	Legislative duties not met by LPA or by developers/developments.	Officers to monitor the impact of BNG and monitoring and ensure that cost recovery where appropriate is effective and put towards necessary resourcing	Treat	3

17.3 The above risks are scored using the matrix below. The Council has determined its aversion to risk and is prepared to tolerate risks where the combination of impact and likelihood scores 6 or less.

Very Likely Likelihood	Low 4	High 8	Very High 12	Very High 16
	Low 3	Medium 6	High 9	Very High 12
	Low 2	Low 4	Medium 6	High 8



Impact Score

- 4 (Catastrophic)
- 3 (Critical)
- 2 (Significant)
- 1 (Marginal)

Likelihood Score

- 4 (Very Likely (≥80%))
- 3 (Likely (21-79%))
- 2 (Unlikely (6-20%))
- 1 (Remote (≤5%))

17.4 In the officers’ opinion none of the new risks above, were they to come about, would seriously prejudice the achievement of the Strategic Plan and are therefore operational risks. The effectiveness of the management of operational risks is reviewed by the Audit Committee annually.

18 Recommendation

That the Policy and Resources Committee recommend to Full Council.

18.1 Note the content of the report.

18.2 Approve the adoption of the Three Rivers Biodiversity Policy.

18.3 Approve the use of the Maple Lodge BNG S106 funding being used on Three Rivers District Council owned land as identified in section 6 (Including: Beechen Wood, Coombe Hill Road open space, Berry Lane & Mead Place).

18.4 Agree in principle for Council owned and maintained land to be considered as potential receptor sites with the final decision on individual receptor sites to be delegated to the Leisure, Climate Change and Community Committee.

Report prepared by:

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APPENDICES

APPENDIX A: Three Rivers Biodiversity Policy

