

Memo

To: Jonathan Markwell

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 01 July 2022

Re: Planning application ref: 220189

Address: 205 - 213 Henley Road And Land To The Rear Of 215-219 Henley Road RG4 6LJ

Description: Demolition of nos. 205-213 Henley Road and rear gardens of nos. 205-209 Henley Road and erection of 2 retirement living apartments blocks (C3 use-age restricted) including communal spaces with supporting car parking, open space landscaping and associated infrastructure. Access into the site from the adjacent development on Henley Road..

The application site comprises five dwellings with gardens which will be demolished and replaced by two three-storey blocks of retirement apartments and associated facilities.

An Ecological Appraisal (Crossman Associates Ecological Consultants, December 2021, ref: A1133.004) and a separate letter about biodiversity offsetting have been submitted. These do not provide adequate information to inform the application and are discussed below.

Desk study data search

The report does not include a desk study data search from the local records centre and hence a full assessment of the proposals has not been made.

The only data search that appears to have been undertaken is accessing the government's MAGIC website.

Habitats

Habitats comprise buildings, hardstanding and gardens (amenity grassland, scrub, ruderal vegetation, trees and hedgerows).

The gardens, which are well established and next to Berry Brook, are likely to be of considerable ecological value. They make up a wide band of largely infrequently managed and undisturbed semi-natural vegetation that runs to the edge of the borough. As a unit and in association with the adjacent green space these gardens will make an important contribution to biodiversity and form part of Reading's green network.

Their loss would not comply with policy H11. The council will need to decide if the need for the retirement apartments outweighs the loss of these gardens bearing in mind the precedent set by the neighbouring development.

[NB on the habitat map in the ecology report there is a red hatched area which is not shown in the key. There are also only three Target Notes which are referred to in the report rather than in the appendix. There is very little information about plant species and there is no botanical species list. This will need to be amended in any future iteration of the report]

Biodiversity net gain calculation

A letter has been submitted with the application dated 4 April 2022. It refers to a biodiversity net gain calculation and concludes that the development will result in a net gain in Habitat Units and in Hedgerow Units.

There is however no accompanying spreadsheet, no maps showing the habitats mapped to the UK Habitat Classification (before and after development) and no habitat condition assessment sheets.

It is therefore not possible to conclude that the development will result in a net gain in biodiversity units but it seems unlikely that it would. This is because the site will go from an established largely under managed garden to two large blocks of flat with newly created and largely formal gardens.

The applicant is advised to submit full details of their Biodiversity Net Gain Calculation.

At present it is not possible to conclude that the development will comply with EN12 or the NPPF.

Reptiles:

The report states that the site supports a small population of reptiles (it does not say which species). It states that “The reptile survey has confirmed the presence of reptiles on site”. There are no details of the reptile survey.

This information, which will need to include dates, times and weather conditions of the surveys, a map showing the locations of the reptile refugia, and details of the surveyors should be provided.

Regardless of this, it is proposed to capture and move the reptiles to a site in Somerset. This is not an acceptable approach and does not comply with guidelines on reptile translocations.

Bats

The report includes the results from bat emergence/re-entry surveys at the dwellings carried out in 2020 and 2021 for houses previously determined to have potential to support roosting bats.

The report concludes that none of the buildings hosted roosting bats in 2021. It is however not possible to assess validity of this conclusion as there are no maps showing where surveyors were positioned and the methodology section of report simply reads:

“An appropriate number of emergence or re-entry surveys were undertaken of each building that was assessed to be suitable for bats. An appropriate number of surveyors attended each survey and were positioned so that all aspects of the building suitable for roosting bats could be observed.”

Summary

The ecological report and the associated letter are not sufficient to determine the ecological impacts of the scheme or that the development will result in a net gain for biodiversity.

Regardless the proposals seem unlikely to comply with policy H11 - Development of Private Residential Gardens.