

Memo

To: James Overall

From: Giles Sutton (RBC Ecology Consultations)

CC:

Date: 30 November 2020

Re: Planning application ref: 200718

Address: Pumping Station Adjacent 20 Chazey Road Caversham Reading RG4 7DS

Description: Demolition of former pumping house and new dwelling

The application site is located on the edge of a block of woodland. It comprises a former pumping station and its curtilage. The woodland is the priority habitat - as defined in the NPPF - lowland mixed deciduous woodland and a Reading Biodiversity Action Plan habitat. A green link (as per policy EN12) crosses the site. The proposal will result in a dwelling being constructed directly adjacent to the woodland and within the green link.

This will result in the loss of the buffer zone of semi natural habitat around the woodland and damage the woodland by, for example:

- Replacing semi-natural habitats with hard surfaces and garden land
- Reducing the size of ecotone between the woodland and the adjacent habitats
- Increasing the amount of built form adjacent to the woodland
- Overshadowing
- Increasing the amount of light and noise pollution
- Increasing disturbance to wildlife
- Increasing damaging activities like littering and fly tipping
- Introducing non-native species and “garden escapees” into the woodland
- Increasing the pressures to fell and lop trees

These effects will be cumulative and over time the priority woodland habitat will degrade. Due to the limited size of the application site (approximately 10 x 20m) these impacts could not be mitigated.

The proposals will therefore be contrary to the following planning policy:

1) Paragraph 170 of the NPPF: “Planning policies and decisions should contribute to and enhance the natural and local environment by [...] minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures”

[The proposals will not minimise impacts on biodiversity and not result in the establishment of a coherent ecological network]

2) Paragraph 174 of the NPPF which reads:

“To protect and enhance biodiversity and geodiversity, plans should: [..]

promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”

[the relevant “plan” in this instance is Reading’s Local Plan and policy EN12 refers to priority habitats and ecological networks]

3) Paragraph 175 of the NPPF which reads:

“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;”

[The degradation of the priority woodland habitat can be considered “significant harm” and no avoidance, mitigation or compensation measures are (or can realistically be) provided for].

4) Reading Borough Local Plan Policy EN12 – Biodiversity and The Green Network which reads:

“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; .. ”

[The adjacent woodland, a priority habitat, is part of the identified green network, and the application site is a green link. Because the proposals will result in the degradation of the woodland and the breaking of green link the proposal will not be maintain, protect, consolidate, extend or enhance the green network.]

4) Reading Borough Local Plan Policy EN14 – Trees, Hedges and Woodland which reads:
“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.”
[The woodland will be damaged]

My advice is therefore that the application be refused on the grounds that:

The development will, by virtue of its location and the nature of the development, have an adverse effect on a block of lowland mixed deciduous woodland which is a biodiversity action plan habitat and a priority habitat as per the NPPF, and part of the identified Green Network as per policy EN12. The application site also forms part of a Green Link as per policy EN12 and the proposals will fragment this link and the wider green network. The proposals will therefore not maintain, protect, consolidate, extend or enhance the green network or protect the priority woodland habitats and is therefore contrary to policy EN12, EN14 and NPPF paragraphs 170 and 175 of the NPPF and policies EN12 and EN14 of the Reading Borough Local Plan.