

Memo

To: Gary Miles

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 2 April 2024

Re: Planning Application ref: 240286

Address: 12 St Benets Way Emmer Green Reading RG4 8SZ

Description: Proposed single storey side extension to create extended garage and workshop.

The application site comprises a house in Caversham where it is intended to add a single storey side extension. The house lies adjacent to an area of woodland to the east and is located on a Green Link as per policy EN12 of the Reading Local Plan.

It is proposed to add an additional garage and workshop on the eastern side of the building. This would be erected within an area of broadleaved woodland which is a “priority habitat” (as defined in the NPPF) and is likely to host a range of protected and priority species.

The proposals will lead to the loss of the buffer zone of semi natural habitats around the woodland and will damage the woodland by:

- the removal of woodland edge leading to reduction in the amount of semi-natural habitats next to woodland that provide important dispersal and feeding habitat for woodland species.
- increasing the amount of built form adjacent to the woodland resulting in overshadowing of the woodland habitat
- increased light spillage onto the woodland from windows and outside lights.
- an increase in activity, light and noise
- increasing disturbance to wildlife
- increasing the pressures to fell and lop trees

These effects will be cumulative and over time will lead to the degradation of the priority woodland habitat.

The development would be at odds with the following planning policies:

(a) Paragraph 185 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” here is the Reading Borough Council Local Plan and policy EN12 refers to priority habitats and species

(b) Paragraph 186 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 deterioration of priority woodland habitat can be considered “significant harm” and no avoidance, mitigation or compensation measures are (or can realistically be) provided for.

(c) 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.*

[...]

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 woodland, which is a priority habitat, is part of the identified green network, and the application site is located in a green link. Because the proposals will result in the degradation of the woodland and therefore the fragmentation of the green link, the proposals will not maintain, protect, consolidate, extend or enhance the green network.

(d) 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 would be damaged.

Summary

The development will have an adverse effect on an area of broadleaved woodland which is a priority habitat as per the NPPF. 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 habitat and is therefore contrary to national policies paragraphs 185 and 186 of the NPPF and local policies EN12 and EN14 of the Reading Borough Local Plan.