

Memo

To: Julie Williams

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 16 January 2024

Re: Application ref: 231644

Address: Park Lane Primary School Infants Department 55 School Road Tilehurst Reading RG31 5AS

Description: Demolition of an existing modular building and installation of a double stack modular building (GIFA approx. 360sqm). Further internal refurbishment of a number of rooms within the existing main building with modifications to external areas, including new play areas, replacement boundary and internal fencing and a new pedestrian access off School Road, to segregate vehicles and pedestrians entering the site, with new staff car parking

The application is for the addition of a new school two storey building following demolition of an existing building at Park lane Primary Infants school. The development proposals also include a new car park area, as well as additional landscaping. The site is located in an urban, residential area of Tilehurst and is split across two sites between infants and junior school with the junior school located approximately 350 to the south west.

Scheme design

The primary school site is located on a green link as per policy EN12 which states:

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; and*

** Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*

In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development.

The proposals include the loss of 8 trees. These are in the area marked: “Relocated/proposed Year R canopy area details for Year R sheltered play area with relocated Year R sheds”. The loss of these trees will result in a net loss in biodiversity units and to comply demonstrate that the proposals comply with the mitigation hierarchy (as set out in EN12 above), particularly as the site is on a green link, the applicant would need to demonstrate why the sheds and play area cannot be located elsewhere and why the trees need to be removed.

Protected and priority species

The ecology and BNG report (HCC Ecology Team, November 2023) concludes that the proposals are unlikely to adversely affect priority habitats or protected species subject to the implementation of mitigation measures within the report.

These measures, which include vegetation clearance undertaken outside the bird nesting season (March to August inclusive), the creation and preparation of stag beetle habitats on site and translocation of stag beetles, larvae and existing dead wood to the new location would be sufficient to ensure that the risk of the works affecting protected species remains minimal. The recommendations should be secured through a planning condition once the issues below have been addressed.

Biodiversity Net Gain

We asked that the excel version of the Biodiversity net gain spreadsheet was sent over and this has now been received.

The excel sheet provided shows that there will be a loss of biodiversity on site and it is proposed to offset this loss at the associated junior school where a single storey annex building is to be demolished. The report states *“Off-site biodiversity proposals are included, and together with on-site measures, the development would result in no net loss of biodiversity for area-based habitats, and a 20.42% increase in the biodiversity value of linear habitats.”*

Comments regarding onsite provision:

As the trees are within a green link the strategic significance should be *“Formally identified in local strategy”*

It is not clear from the spreadsheet how the trees (and subsequent loss of trees) has been accounted for in the metric (the spreadsheet includes three entries for trees in the baseline habitat tab with a total area of 0.3181 ha and it appears that 0.2888 ha will be retained: a difference of 0.0293 ha. Using the urban tree helper app within the spreadsheet calculates that the loss of 8 trees is equivalent to the loss of 0.0326 ha (as a minimum). Please can the applicant supply details of which trees are to be removed and how this area has been calculated.

The Habitat creation tab includes 14 trees to be planted, however the plan in the report only shows eight and the accompanying report states that *“The development will also result in the loss of eight trees. Eight new trees will be planted (as shown in the proposed plan), while a further six trees will be planted elsewhere either on-site or off-site, at the discretion of Reading Borough Council.”* Please could the applicant confirm the arrangements for this as without these six trees, the calculation shows a net loss in biodiversity.

Comments regarding offsite provision:

The Off-site biodiversity provision includes new trees after proposed replacement of the annex building. Full details have not been provided and it is likely that the building would need to be assessed for bats prior to demolition – this information is not included in the report. i.e. very little information has been given about the offset area

The report states: *“This offsite area is currently all either hardstanding or existing building of no biodiversity value in BNG terms. While part of this will remain as cleared ground pending future proposals, part of the site will be redeveloped as additional car parking.”*

However images from Google maps show that this part of the site appears to include an area of grassland, flower beds and is bordered by lengths of hedging.

Summary

It has not been demonstrated that the proposals will result in a net gain in Biodiversity Units and that the mitigation hierarchy has been followed and as such that the proposals comply with policy EN12.