

Memo

To: Marcelina Rejwerska

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 18 November 2024

Re: Planning application ref: PL/24/1281

Address: SPRINGWOOD, THE WARREN, CAVERSHAM, READING, RG4 7TQ

Description: Erection of a two-storey rear extension to include a first floor balcony, extension of the eastern single storey area, a front two storey extension on the existing porch, and an upward extension of the existing western extension as well as alterations to the hard and soft landscaping.

The application site comprises a detached dwelling with garden along the Warren in Caversham, Reading. The site is located on the banks of the river Thames (a priority habitat) and is surrounded by habitat of high potential for commuting and foraging bats including The Thames, neighbouring large gardens lined with hedges and trees, woodland within The Warren Woodlands complex (a Local Wildlife Site) less than 5m metres to the north.

The planning statement provided shows refurbishment of the inside building and extensive external alterations with large single storey and two storey extensions planned on all sides of the existing building.

The Ecology Report (ROAVR Group, July 2024) concludes that the proposals are unlikely to directly affect protected species such as bats. However, there are likely to be nesting birds on site and the site could be traversed or used as a foraging resource by a range of protected and priority species including otter, water vole, badger, as well as bats. Other risks of the proposed development to priority habitats ie the River Thames and protected wildlife include:

- Pollution (including surface water runoff, dust, noise, littering etc.) during and after construction works
- Excessive illumination by new external lighting impacting the river Thames and other wildlife-sensitive areas
- Disturbance or damage to wildlife resting places, such as those of water fowl (as per the ecology report)

Unmitigated, the above risks would lead to a deterioration in the quality of the Priority Habitat River Thames and a loss of biodiversity. As such, should the application be approved, all works will need to be undertaken in accordance with an approved under a comprehensive Construction Environmental Management Plan (CEMP) for biodiversity which details measure to protect wildlife and the river during construction. This could be secured via a planning condition.

The River Thames and Biodiversity

The River Thames is a habitat of principle importance for the conservation of biodiversity in England and is listed under s41 of the Natural Environment and Rural Communities (NERC) Act 2006. It is a 'priority habitat' as defined in the NPPF. Paragraph 179 of the NPPF states that plans should safeguard and enhance "wildlife corridors" and "ecological networks", which in this case, include the River Thames. Furthermore:

EN11: (WATERSPACES) of the Reading Local Plan reads

Reading's waterspaces will be protected and enhanced, so that they can continue to contribute to local and regional biodiversity and ecology, flood mitigation, local character, heritage and visual amenity, the provision of accessible leisure and recreational opportunities and, where appropriate, navigation. There will be no adverse impact on the functions and setting of any watercourse and its associated corridor.

Where development in the vicinity of watercourses is acceptable, it will:-

- Provide appropriate, attractive uses and buildings that enhance the relationship of buildings, spaces and routes to the watercourse, including through creating or enhancing views of the watercourse, and create a high quality public realm;
- Make positive contributions to the distinct character, appearance, historic significance, landscape and amenity of the watercourses;
- **Provide a strengthened role for watercourses as important landscape features, wildlife corridors, historic features and recreation opportunities;**
- Wherever practical and consistent with its biodiversity role, provide good, level access to and along the waterside for all those who want to use it;
- **Be set at least ten metres back from the watercourse wherever practicable and appropriate to protect its biodiversity significance;**
- **Improve the quality of watercourse environment through protecting and enhancing habitats and ensuring that habitat creation is balanced with access and urban uses; and [...]**

(Note: EN11 requires a minimum 10m wide undeveloped buffer zone measured from the bank top to the edge of a new development. This zone should be free of hard standing, formal footpaths, fencing, formal landscaping and lighting)

And EN12 (Biodiversity and the Green Network) reads:

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.*

The plans do not demonstrate how the development will enhance the wildlife corridor or achieve a net gain for biodiversity. In a riverside context such as this one, enhancements should specifically focus on improving the river corridor. However, the landscaping plans and 'photo' within, that the proposals introduce a length of wall and hardstanding ('development') along the edge of the River Thames. This could potentially harm local wildlife and reduce the ecological status of the river. The applicant should provide details of how the plans comply with local policies EN11 and EN12, as well as national policy, regarding the river corridor.

Lighting

Any additional lighting may introduce light pollution onto the river. As such details of how the lighting (internal and external) associated of the proposed development will comply with the following national and local planning policies should be provided.

Paragraph 191 of the NPPF reads:

“Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development. In doing so they should: [...]

c) limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”

Local Policy EN16 :

“Development will only be permitted where it would not be damaging to the environment and sensitive receptors through land, noise or light pollution”

Summary

The proposals do not currently comply with planning policy, in particular EN12, EN11, and para 179 of the NPPF. In addition, further details would be needed to ensure compliance with EN16 and Para 191 of the NPPF

Furthermore, if you have not done so already, you should seek the view of Environment Agency on this matter.