

Memo

To: Anthony Scholes

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 17 March 2025

Re: Planning application ref: PL/25/0102

Address: 1029 OXFORD ROAD, TILEHURST, READING

Description: Development of new building to provide 2no.1 bedroom and 6no. 2 bedroom flats along with the creation of 8 parking spaces and associated landscaping Following the demolition of the existing building

The application site comprises a detached house with garden along the Oxford Rd in a residential area of west Reading. It is proposed to demolish the house and replace with a building comprising eight flats. The site is surrounded by habitat of good suitability for use by commuting and foraging bats – large, connected gardens to the rear, a railway corridor bordered with trees 60m east, with the River Thames 100m east.

Biodiversity Net Gain (BNG):

The applicant has taken on board per previous comments about the BNG and confirmed that they will be buying off site units to deliver the 10% BNG required by law. However they have changed the Red Line Boundary (RLB) in the BNG report (but presumably this not been changed in the submitted plans as no new plans have been provided) which reduces the baseline number of units and therefore the number of offsite units they would need to buy to deliver a 10% net gain.

The RLB needs to include the entire garden – the NPPG reads:

“The application site should be edged clearly with a red line on the location plan. It should include all land necessary to carry out the proposed development (eg land required for access to the site from a public highway, visibility splays, landscaping, car parking and open areas around buildings). A blue line should be drawn around any other land owned by the applicant, close to or adjoining the application site.”

And the Planning Portal reads:

“Your red line boundary should include the entire site, i.e., land required for access to the site, car parking, gardens, and other outbuildings around the site, such as garages.

The BNG report also has a number of inconsistencies and omissions of key information relevant to the BNG calculation of the site, along with numerous spelling and grammatical errors. The following points are of particular concern (this is not an exhaustive list):

(a)The report states:

“On-site habitat baseline (excluding trees) of 0.0829ha and biodiversity units equalling 0.24.”

This is incorrect – The baseline value provided includes the tree area.

(b)The report states

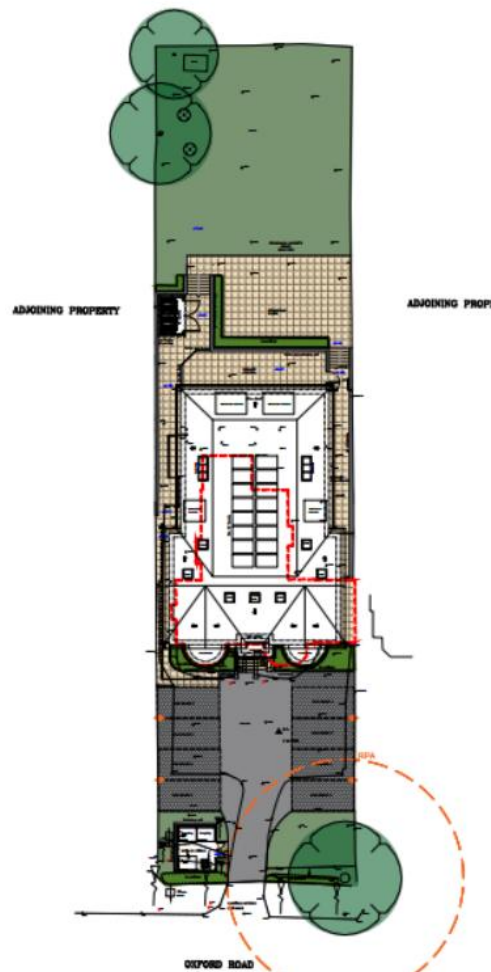
“As part of the final overall BNG calculation, tree T1, only half of the are dhs been recorded within the site, as half of it sits outside of the site boundary, therefor not all of it is directly contributing to the sites value.”

Not only is this badly written and contains multiple mistakes but the ‘statement’ does not agree with the values for trees presented in the updated metric spreadsheet. The tree in question is recorded as a large tree with an area of 0.0366. When halved, this would be 0.0183, and not 0.0138 used in the metric calculation (but it is not correct to include half a tree within the metric in any case)

(c) The report states

“Each of the post-development habitats (as set out on the Post-Development Plan, Figure 3) have been inferred from the ‘Proposed Site Layout with Topo’ (Drawing Number. 24.1168 P.01 G) (Harding Rose Architects, 2024).”

This conflicts with the actual submission. The plan referenced does not agree with what has been submitted and relates to my first point (1) above



(d) Numerous grammatical errors in the document including statements including:

- *“The front vegetated garden is being largely retained and the large tree horse chestnut tree (which will have some management to remove excess dead standing wood which could cause harm and to pro long the life of the tree). woo.:*
- *“As trees are to be retain on site, there are not included within the calculation”.*

Summary (BNG)

An updated and corrected BNG report and calculation will need to be provided before any further comments on this application can be provided. Please ensure all grammatical errors are corrected and that the report is prepared to an appropriate professional standard, as the current submission does not meet expected requirements.

Bats:

An updated report has been submitted – however it is not clear what has been updated and the report does not appear to have taken on board our previous advice (see email dated 4/3/2025) that unless there were exceptional circumstances the application should be refused.

Since the applicant has not provide any new information or a justification as to why the bat survey could be conditioned, our advice is that the application should be refused on the grounds that insufficient information has been provided to determine the likely impact of the proposals on bats which are a protected species and a material consideration in the planning process..

Alternatively a bat survey in May could be undertaken which would demonstrate the presence or likely absence of roosting bats and the applicant may wish to agree an extension of time.

Summary

The BNG calculation is still incorrect as they have attempted to change the RLB and there are numerous mistakes in the submitted report.

There are no exceptional circumstances that would allow the council to condition further bat surveys and either the application would need to be refused or an extension of time agreed to allow the survey to be undertaken.