

Memo

To: Anthony Scholes

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 24 April 2025

Re: Planning application ref: PL/25/0350

Address: 58 BATH ROAD, READING, RG30 2AY

Description: Erection of five detached 4-bed dwellings, and associated works, following demolition of detached bungalow

The application is for the erection of five detached dwellings on a site off Bath Road. The site includes a detached bungalow within a large garden and access to the site will be provided via an existing access drive.

Local Planning Policy

In relation to local policies regarding biodiversity, the site lies adjacent to a Green link (Policy EN12 Biodiversity and the Green Network which requires development to “*be maintained, protected, consolidated, extended and enhanced*” and “*should not result in a net loss of biodiversity*”. Policy H11 (Development of private Residential Gardens) also requires that developments avoid adversely impacting biodiversity, particularly where those gardens make an “*important contribution to biodiversity and contribute to the green network* “

Our pre-application advice for a previous redevelopment of the site was that the scheme was unlikely to comply with EN12 or H11 and likely to be unacceptable from an ecological perspective. The applicant was asked to submit details of:

1. An ecological report (including a bat survey of the building and for any trees to be removed),
2. A Biodiversity Net Gain (BNG) report with metric calculations and associated mapping demonstrating compliance with Policies EN12 and H11.

Submitted Information (and comments)

(a) Ecology report

A bat survey of the existing bungalow has been submitted (Crossman Associates, January 2025). This comprises a bat survey of the bungalow to be demolished and concludes that the bungalow is unlikely to adversely affect roosting bats. However, at least two trees are to be removed. One of these (T12) is described in the conditions assessment sheet as “*Natural ecological niches for vertebrates and invertebrates are present...*” It is unclear whether this tree, or other trees (for example G11 in the hedgerow which will be removed) have been assessed for potential bat

roosting features and whether their removal could affect roosting bats. Prior to determination of the application, the applicant will need to provide an updated ecological assessment which covers all trees that are proposed to be removed.

(b) Biodiversity Net Gain (BNG)

The BNG submission lacks essential information, including the following:

- Baseline habitats are not explained - no maps showing habitats pre and post development have been provided. These maps should be specific metric maps showing existing and proposed UK Hab Habitats
- Hedgerow condition assessments for all hedges on site are required
- Tree G11, which is shown for removal in the Arboricultural report, should be included as per Statutory Metric guidelines which read:

Recording baseline trees within hedgerows and lines of trees

If any medium, large or very large trees within a hedgerow or 'rural' line of trees are being removed, record these in the area baseline as individual trees. The removal of trees may also influence distinctiveness or condition of hedgerows and 'rural' lines of trees within the hedgerow module.

Where there is no loss (or change of condition) of individual trees within a hedgerow or 'rural' line, the individual trees within that feature do not need to be recorded separately in the baseline.

- The BNG report provided states: *"A gain in hedgerow value will be achieved by planting 10 m of species-rich native hedgerow within a communal area of the site"*. This communal space does not appear to be included in the metric, instead it appears to be included as 'vegetated garden'. The metric will need to be updated to include this area (it should also be shown on the maps).
- The site is within an Air Quality Management Area and a treed corridor and is formally identified in the local strategy . As such, all retained and removed trees should be identified as such in the metric

Addressing the above points, my rough calculation shows that the scheme will result in the net loss of 0.74 Area Habitat Units (AHUs) .

To achieve the required 10% net gain, the development will require 1.07 AHU. Furthermore, the application does not comply with trading rules and will result in the loss of 0.61 habitat units of Medium Distinctiveness -due to the removal of the trees. According to the BNG hierarchy, habitats with a distinctiveness of medium (or higher) must be retained unless there is a compelling justification for their loss - no such justification has been provided

Summary

The applicant will need to submit an updated report detailing bat assessments of trees to be removed and an updated BNG calculation with maps that address the points above.

Regardless, even with if this missing information is provided, the proposals will lead to a significant loss of biodiversity which is likely to be unacceptable.

The Council will need to be sure that all opportunities to preserve and enhance biodiversity on site have been fully explored before relying on off-site compensation. It will need to be satisfied that all tree removal is essential, that areas allocated for buildings and hardstanding are essential, and that the number of houses on the site is acceptable. It may be possible for example, to reduce the number of houses, or design smaller dwellings with larger gardens or minimise the extent of

hardstanding areas (for example by reducing areas set aside for patio and parking) – which will help to reduce the large biodiversity loss.

Should the council decide that such a large loss of biodiversity on site is acceptable, it will need to then decide whether offsite provisions to mitigate this loss are appropriate.

Our advice is that the application should not be determined until the following information has been provided:

- (a) A review of the development plans including confirmation from the applicant on why all existing trees need to be felled and why garden areas cannot be expanded.
- (b) An updated bat assessment of any trees to be removed
- (c) Correction of the errors in the BNG calculation listed above, including appropriate UK Hab maps and condition assessments