

Memo

To: Louise Fuller

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 7 April 2025

Re: Planning application ref: PL/25/0422

Address: 92 Albert Road, Caversham, Reading

Description: :Erection of detached dwelling

The application site comprises an area of garden where it is proposed to erect a detached dwelling. The site is located within a Green Link as per policy EN12 of the local plan.

The proposals will result in the loss of much of the existing garden.

It is our advice that the application as it stands does not comply with policies EN12 and H11. It will lead to the loss of private garden land, within a designated Green Link and would does not provide “biodiversity net gain wherever possible”.

The Biodiversity Net Gain metric submitted shows a net gain in habitat units – however, we are concerned over its accuracy (see points below) and our advice is that the proposal does not meet the requirements of Policy H11. Additionally, it does not ‘maintain, protect, consolidate, extend or enhance’ the identified Green Network, instead contributing to its fragmentation, contrary to Policy EN12.

Biodiversity Net Gain

Under the Environment Act 2021, all (non-exempt) developments are required to deliver a minimum 10% Biodiversity Net Gain (BNG), demonstrated using the Statutory Metric.

The development will lead to a large part of the garden being replaced by hardstanding. The applicant has submitted a small sites metric that concludes that the development will lead to a net gain of 0.0052 (AHU) units (equivalent to 12.27%) through the inclusion of a green roof and nine small trees in 8m² areas in the southeastern corner of the site.

However, the net gain habitat units is likely to be incorrect for the following reasons:

- (1) the calculation includes urban trees as part of the habitat creation. Trees within gardens should not be included in the metric as trees within private gardens as the metric guidelines read:

“Where private gardens are created, any tree planting within the created garden should not be included within post-development sheets of the metric. The habitat type ‘Urban – Vegetated garden’ should be used. “(Additionally, the practicality of accommodating 9 trees within such a small area - 8m² - is questionable and unlikely to be acceptable. These trees are also incorrectly labelled on the landscaping plans as being 3 metres apart)

(2) the metric includes an area of modified grassland as a post intervention habitat. This area falls within the garden and should be shown in the metric as Vegetated Garden as the council would have no control over how this area will be managed post development and certainly not for 30 years.

(3) the calculation shows an area of green roof. While this can contribute to biodiversity, it will be located upon a built structure and (as with point 2 above), the local planning authority would have no power to enforce or monitor the management of the green roof for the minimum 30 years period to contribute towards BNG calculations. As such it should not be included in the metric

An updated metric should be provided which addresses the above points. Furthermore, our advice would be that the house may constitute over-development of the site. To mitigate the net loss in biodiversity, a smaller house design and reduced hardstanding around the dwelling would help.

Currently, it has not been demonstrated that the proposals will deliver a net gain for biodiversity.

Summary

The proposed development will lead to a large dwelling and result in a likely large loss of biodiversity. Unless it could be demonstrated that there are suitable alternatives exist, the proposals would not accord with the local Policies H11 and EN12. The council will need to decide whether the loss of biodiversity on a Green Link is acceptable and if so, whether offsite provisions to mitigate this loss are appropriate.