

Memo

To: Louise Fuller

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 17 June 2025

Re: Application ref: PL/25/0680

Address: 5 Stoneham Close Tilehurst Reading RG30 4HB

Description: New dwelling to the rear of No.5, replacing existing garage, including parking and landscaping.

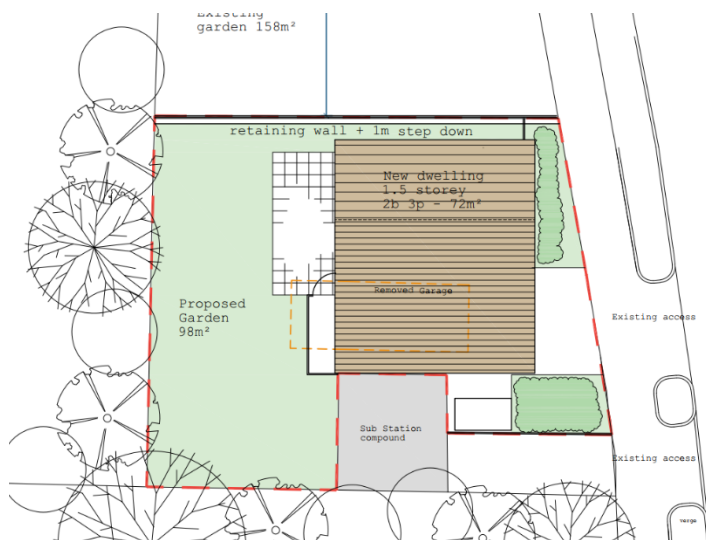
The application site comprises a garden and garage to the rear of 5 Stoneham close where it is proposed to demolish the garage and erect a single house.

The application is similar to application 211184 and 220943, both of which were withdrawn and applications 230120 and 240998 which were refused.

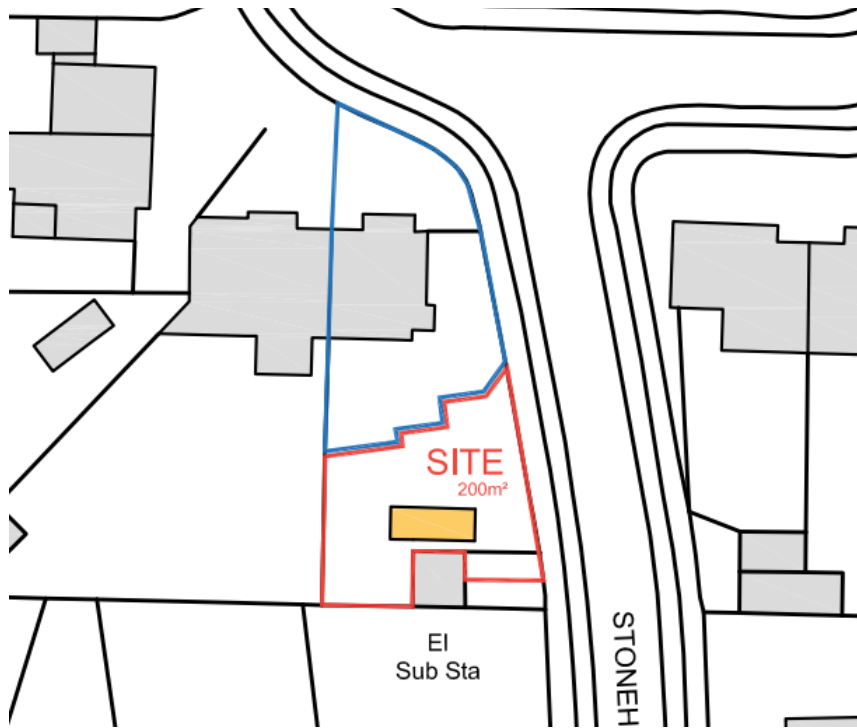
Red Line Boundary

There appears to be a discrepancy regarding the red line boundary of the application site.

The applicant has provided the Proposed block and site plans (Colony Architects, dated 04.25) which shows the following red line boundary



However, both the Site Location Plan (Colony Architects, dated 03.25) and the Phase 1 map included within the ecology report (Provision, March 2025) show a different red line boundary:



The applicant will need to clarify which red line boundary is correct

Biodiversity Net Gain (BNG)

The applicant has stated within the application form that the site is not subject to Biodiversity Net Gain as it measures less than 25m²:

Reason biodiversity net gain does not apply:

Development subject to the de minimis exemption (development below the threshold)

What best describes the size of your site?:

Under 25 square metres

Please justify the reason why biodiversity net gain does not apply:

The proposal footprint is less than 25 sqm, when the existing garage is taken into consideration

However, as above, this is dependent on the correct red line boundary being confirmed. Until this is resolved, the above claim cannot be verified.

Regardless of what site boundary is used and whether the site is subject mandatory to BNG, the scheme is still subject to local policy requirements, namely Policies H11 and EN12 (which have also been highlighted in our previous responses)

Policy H11 (Development of Private Residential Gardens) of the Reading Local Plan states:

Proposals for new residential development that includes land within the curtilage or the former curtilage of private residential gardens will be acceptable where:

[.....]

The development provides biodiversity net gain wherever possible, and would not have an adverse impact on biodiversity in terms of the fragmentation of blocks of gardens, which as a unit or in association with adjacent green space are deemed to make an important contribution to biodiversity and contribute to the green network; ...

EN12 (Biodiversity and the Green Network) states:

“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

Conclusion

Until the red line boundary is clarified and the exact site area confirmed, it is not possible to assess the validity of the applicant's BNG exemption claim.

Once this issue has been resolved, even if statutory BNG is not required, our advice is that it has not been demonstrated that the proposals will not result in a net loss of biodiversity as measured using the Statutory Metric. This is contrary to the policies EN12 and H11 above. To demonstrate compliance with these policies, the applicant will need to submit a net gain calculation, using the Statutory Metric to demonstrate how a net gain in biodiversity units will be achieved. The metric itself will need to be submitted for review.