

Memo

To: Marcelina Rejwerska

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 1 October 2025

Re: Planning application ref: PL/25/1263

Address: 146 SOUTHAMPTON STREET, READING, RG1 2RD

Description: The extension and refurbishment of an existing Listed house. New off street parking and external landscaping

The application site comprises a mid terrace listed building in a residential area in the middle of Reading. It is proposed to refurbish the house and add a parking area at the front of the house.

The applicant has submitted an ecology report (Arbtech, April 2025) and results of three dusk emergence surveys (Arbtech, July 2025) No bats were seen emerging from the building and the reports conclude that the proposals are unlikely to affect roosting bats.

Local Policy (Biodiversity)

Policy EN12 of the Reading Local Plan 2019 reads:

a) The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:

- *Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and*
- *Areas with potential for biodiversity value and which stitch the Green Network together – designated Local Green Space and open green spaces, and existing and potential Green Links.*

New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

b) 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.*

Policy EN12 seeks to protect and enhance biodiversity across the borough and ensure development contributes positively to the Green Network. It applies to all sites across the borough including the designated Green network and areas that “... stitch the Green Network together “. These areas include private gardens and trees and play a major role in this network and are particularly important in densely urbanised areas of Reading (such as this site.)

The plans show a large area of the front of the house would be converted into parking space and car access. This will lead to the loss of much of the front garden and numerous trees. The Tree report (GHA Trees, August 2025) states that eight trees will be removed across the whole site (T1, T3, T4, T5, T9, T10, T11, and T13) although the tree plan does not appear to be on the public website.

As such, the application does not comply with Policy EN12 above as it does not “... provide a net gain for biodiversity...” as required by part (b) of the policy. Furthermore, no biodiversity net gain metric has been submitted, however the removal of these trees would clearly result in a significant loss of biodiversity.

The proposals also conflict with part (a) of EN12 which requires development to “... maintain, protect, consolidate, extend, or enhance ...“ the existing Green Network and would instead lead to its fragmentation.

Summary:

The proposals do not comply with Policy EN12 of the Reading Local Plan which is intended to prevent biodiversity loss and ensure development contributes positively to the Green Network. The loss of much of the garden space and the trees in such an urban area would represent a significant negative impact on local biodiversity which is contrary to local planning policy.