

Memo

To: Louise Fuller

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 4 November 2025

Re: Planning application ref: PL/25/1431

Address: 110 Norcot Road, Tilehurst, Reading, RG30 6BT

Description: Erection of a detached 2 bed bungalow with parking

The application site is part of the garden of 110 Norcot Road currently used as a drive and garage. It is proposed to erect a detached 2 bedroom bungalow on this land with access through the grounds of 110 Norcot Road. The site lies in a residential area of Tilehurst and on a Green Link as per policy EN12

Ecology considerations

The DAS states that “*Great crested Newts and other Protected species have not been identified within proximity to the site, however, Ecology surveys, if required, and details of mitigating measures are proposed to be dealt with at condition stage.*”

However, this statement is incorrect and surveys must be carried out prior to the granting of planning permission in accordance with national planning guidance (see details below highlighted under Planning Policy). As the existing building (garage) will be removed and may possess features potentially suitable for use by roosting bats, a bat survey report will need to be provided before this application can be determined – details below:

Legislation

All species of bats receive protection under UK law and it is a criminal offence under the Wildlife and Countryside Act 1981 (as amended) and The Conservation of Habitats and Species Regulations 2017 (The Habitat Regulations), deliberately or recklessly to destroy or damage their roosts, or to disturb, kill or injure them without first having obtained the relevant licence for derogation from the regulations from the Statutory Nature Conservation Organisation (the SNCO - Natural England in England).

Planning policy

Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (this document was not revoked by the National Planning Policy Framework) states that:

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in

making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.”

In this case because neither the presence or otherwise of protected species, nor the extent to which they may be affected has been established, the application would not be in accordance with the above planning policy, or other planning policy in relation to biodiversity.

Survey requirements

A presence / absence bat survey is normally undertaken in two stages, firstly a preliminary roost assessment, whereby the inside and outside of the building is surveyed for bats and signs of bats. This survey can be undertaken at any time of year.

If bats are found or features within the building have the potential to support roosting bats and these will be affected by the proposals, further dusk emergence and or pre-dawn re-entry surveys during the bat active season (i.e. between May and the end of August/ sub optimally until mid-October) would need to be carried out. The applicant would then need to submit the results of the survey(s) along with any associated mitigation strategy prior to determination of the application.

Surveys should be carried out by suitably experienced ecologists who are a member of a professional organisation such as the Chartered Institute of Ecology and Environmental Management and / or are licensed or accredited by Natural England to survey bats.

Summary

The garage to be demolished may host roosting bats and to confirm whether this is the case, and if so how bats will be affected by the proposals, a bat survey will need to be carried out. The survey will need to be carried out prior to determination of the application or the application would need to be refused on the grounds that insufficient evidence had been provided to determine the likely impacts of the proposals on bats (which are a protected species and a material consideration in the planning process).

Biodiversity Net Gain (BNG)

The proposals are subject to mandatory Biodiversity Net Gain as well as local policy requirements (Policy EN12) which states: “On all sites, development should not result in a net loss of biodiversity”.

The applicant has stated on the application form that the proposals are not subject to BNG as the size of the site is under 25 square metres.

However, aerial imagery of the site show the site to comprise areas of vegetated land – mostly grassland to the east of the existing house. I estimate the area to be over 25m2 and therefore the proposals are not exempt from BNG.



Regardless, the proposals will need to demonstrate compliance with local policy (EN12) which reads:

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.

As such, the applicant will need to provide a biodiversity net gain calculation using the Statutory Metric. The calculation will need to be accompanied by the spreadsheet, as well as maps showing the habitats before and after development.

The DAS states: “The proposal seeks to improve biodiversity within the curtilage of the site, with the proposed Planting scheme increasing the potential habitat for wildlife (see Landscape Plan)”. The landscape plan however shows mostly hard standing with a tiny rear garden planted with “Buddleia, Salvia, Sarcococca and Aucuba” and an area of lawn. I am unsure of how well these plants will establish successfully given the shading from the trees to the south of the site (although the last two species are known to be shade tolerant). As such, it is difficult to conclude that the current proposal will improve the biodiversity of the site

Furthermore, the application form states that there are no trees or hedges adjacent to the proposed development site. It would appear that this is incorrect as images of the site from Google earth view show trees to the south of the site and a leylandii hedge to the north east of the site. It is not clear from the imagery whether these trees are within the application site boundary but if they are, they should be included in the BNG calculation.