

Memo

To: Catrin Davies

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 24 November 2025

Re: Planning application ref: PL/25/1447

Address: 19 PARKSIDE ROAD, READING, RG30 2BT

Description: The erection of four residential dwellings (phased) with associated hard and soft landscaping and parking with the construction of a new access from Parkside Road and Kearsley Road following demolition of outbuildings (outline application considering access all other matters reserved (appearance, landscaping, layout, scale))”

The application site is a detached dwelling with large mature garden to the west of central Reading where it is proposed to erect four houses with associated parking and landscaping. A pre app for the erection of nine houses on this site was put forward in May 2024. The current application is for access only into the proposed site with all other matters reserved.

Access is proposed from both sides of the site — from Parkside Road to the east and via Kearsley Road to the west. It appears the existing house will remain unaffected by the development, although the garage will need to be removed to provide new access onto Parkside Road.

Our view is that the proposed development to the west of the site raises significant issues in relation to both the Biodiversity Net Gain (BNG) hierarchy and the degree of tree loss – 39 trees are proposed to be removed. The area to the west of the site (off Kearsley Road) is likely to be of most value for wildlife and includes numerous semi-mature and mature trees – all of which are categorised as medium-distinctiveness habitat.

The submitted BNG calculation shows a net loss of approximately - 4.35 biodiversity units equivalent to a loss of approximately -77% mainly due to the loss of these trees. Such a large loss would require the purchase of at least five off-site units to achieve mandatory net gain. This would work out at a cost of approximately £100- 200k. The applicant may therefore wish to consider whether the scheme is viable in its current form.

Paragraph 008 Reference ID: 74-008-20240214 (<https://www.gov.uk/guidance/biodiversity-net-gain>) of the National Planning Practice Guidance (NPPG) sets out a clear BNG hierarchy, requiring applicants to demonstrate that biodiversity impacts have first been avoided, then minimised before considering off-site compensation. In this case it appears unlikely that the hierarchy can be complied with for the western area of the site as this is where most of the trees will be removed. The applicant may therefore wish to consider revising the scheme to remove the western element of the site.

The other section of the site within the central area is of lower ecological value and may be more acceptable in principle. However it is not clear how the proposals comply with local policies on biodiversity including EN12 (Biodiversity & the Green Network) and H11 (Development of Private

Residential Gardens) and the applicant should supply details of how the proposals will meet the requirements of these two policies.

Ecology report:

The report Turnstone (September 2025) has been submitted in support of the application:

The report states:

“The buildings and trees were assessed for their suitability for use by roosting bats, with particular emphasis placed on the areas in and around those being directly impacted by the proposals. The assessment involves a consideration of various factors including;

[...]

Based on these factors, an assessment was made of whether the buildings or trees might support bats and the type and number of roosts that might be present.”

However while details of bat surveys of the buildings have been provided, no details of the bat surveys on trees have been provided. Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System) 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.”

Unless you think otherwise, there are no ‘exceptional circumstances’ identified in the Ecology report. As such, the applicant will need to submit the results of bat surveys of the trees prior to determination of the application.