

Memo

To: Alison Amoah

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 27 February 2026

Re: Planning application ref: PL/25/1074

Address: 147 Upper Woodcote Road, Caversham, Reading, RG4 7JR

Description: Erection of new dwelling

The application is for the erection of a new dwelling to replace the existing which has been demolished. The site lies in a residential area of Caversham, Reading. The site is surrounded by habitat of good suitability for use by foraging and commuting bats including large, connected gardens with trees, and open space associated with Caversham Golf Course to the rear of the garden.

Biodiversity Net Gain (BNG)

From 12 February 2024, it is a legal requirement under the Environment Act 2021 that all developments (unless exempt) must demonstrate a net gain of at least 10%. The application form states that the new house will be a 'self build' construction and as such is exempt from this requirement.

The applicant will need to provide evidence confirming that this is a 'self build' development as defined in section 1(A1) of the Self-build and Custom Housebuilding Act 2015.

Regardless of any exemption from the statutory BNG requirement, the plans remain subject to local planning policy EN12. This reads:

"On all sites, development should not result in a net loss of biodiversity"

[...]

"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."

While the baseline habitats (predominantly garden and hardstanding) are of relatively low ecological value, they will be lost to accommodate an increase in hardstanding and building associated with a larger house, new patio and parking and access areas. Given the relatively large increase in hardstanding, the applicant is asked to submit a biodiversity metric calculation to

demonstrate that the development will not result in a “net loss of biodiversity” in accordance with EN12. At present, this has not been demonstrated and as such, the proposals do not comply with policy EN12.

Photos of the site appear to show that a large tree in the front garden has been removed. In accordance with the NPPG, the baseline for the biodiversity calculation should reflect the site condition prior to any tree and vegetation clearance. The removed tree (and any other such vegetation) should therefore be included within the baseline habitat assessment. The NPPG reads:

“It may also be relevant to consider whether any deliberate harm to this biodiversity value has taken place in the recent past, and if so whether there are grounds for this to be discounted in assessing the underlying value of the site (and so whether a proposal would achieve a genuine gain).”

And the Statutory Biodiversity Metric user guide (DEFRA) which reads:

“If a habitat has been cleared, destroyed or degraded previously, and you should use an earlier baseline, you must:

- use the pre-degradation habitat type as the site’s baseline*
- evidence how this habitat type and condition has been determined in the user comments*
- record the habitat as lost within the biodiversity metric tool*
- account for the time between the habitat loss and compensation using the ‘delay in starting habitat creation or enhancement’ function”*

At present we have insufficient information to conclude that the proposals will result in a net gain in habitat units which is contrary to policy EN12

Biodiversity Enhancements

Policy EN12 further 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 accordance with EN12, it is recommended that the applicant is asked to submit plans showing ecological enhancements for wildlife (such as integral bird and bat boxes and wildlife friendly landscaping) within the development. These can either be supplied on plans (which should show locations, specifications and elevations) prior to determination or secured by condition –

Lighting

Artificial light at night can significantly and adversely affect wildlife. It disrupts the life cycle and behaviour of invertebrates, bats, and other wildlife.

No lighting plans have been provided with the application. Given the site’s location and its proximity to numerous bat roosts, it is recommended that a condition is put in place to ensure that no further external lighting is installed within the new development without prior approval by the council.