

Memo

To: Sian Hickey

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 19 March 2026

Re: Planning application ref: PL/26/0135

Address: 9 BATH ROAD, READING, RG1 6HH

Description: Erection of outbuilding for use associated with Kadampa Meditation Centre

The site is a detached house in a residential area of Reading . The site lies on a green link as per local policy EN12.

It is proposed to add a single storey outbuilding measuring 53 sqm with the rear garden.

Effect of development on wildlife

The site comprises building, some hardstanding areas, grassland and large scattered trees to the rear and front of the site. It appears that none of the existing trees will be impacted by the development and the outbuilding will be erected on a grassed area. The grassland is of limited ecological value and as such, no adverse impacts on protected species or priority habitats are expected.

Biodiversity Net Gain (BNG)

From 2024, it is a legal requirement under the Environment Act 2021 that all developments (unless exempt) must deliver a minimum 10% Biodiversity Net Gain.

The applicant has submitted a small sites statutory metric and habitat plans showing pre and post development habitats. The calculation shows that a net gain of 0.1116 Area habitat units equivalent to 10.66%, can be achieved through the planting of trees and the conversion of 53 sq metres of garden to wildflower and sensory planting areas.

However it is our advice that this calculation is incorrect for the following reasons:

- (1) The metric shows the new area of hardstanding as Vegetated garden. Put simply the loss of grassland to be replaced by hardstanding has not been reflected in the calculation.
- (2) Only four medium trees and 4 small trees are shown in the calculation. The submitted tree survey report also shows one single very large tree (with a diameter of 110 cm) This should have been included in the calculation (It is also unclear what will happen to this tree as the tree survey recommendations are for removal)
- (3) The tree survey report includes details of hedges on the site. These need to be included in the baseline habitat assessment and a 10% net gain required also applies to these hedgerows.

- (4) The post development habitat shows two medium trees to be planted – these should be shown in the metric as small trees in line with guidance
- (5) The tree survey report refers to a tree that has been removed – see extract below.

No.	Species	Height	Trunk Dia.	Radial Crown Spread	Crown Clearance	Height to 1st Branch	Life Stage	Physiology	Structure	Landscape Value	Est. Years	Comments	Category
7	Purple Leaved Plum	7m	230mm 210mm 160mm 130mm ivy est	NE4m SE6.5m SW4m NW1.5m	2m	0m	Mature	Average	Below average	Low	10-20	Growing on boundary line; ivy on trunk; crown biased to SE.	C
8	Hazel											Tree no longer present!	
9	Chanticleer Pear	5.5m	100mm 150mm 55mm ivy	NE3m SE3.5m SW2m NW1.5m	1.5m	1m	Mature	Below average	Below average	Low	10-20	Small ornamental tree; dense ivy into upper crown which is suppressed by the ivy.	C
10	Common	12m	850mm	4m	2m		Mature	Average	Average	Low	20-40	Off-site tree; growing adjacent to 1.5m boundary wall; wall distorted adjacent to trunk of tree; historically	B

Can the applicant clarify when this tree was removed. The previous tree survey undertaken in September 2020 showed this tree to be present and as such, the baseline on which the BNG calculation is made should be taken as that before the loss of this tree – this would be in accordance with the NPPG which 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 DEFRA Metric user guide which reads:

“If a habitat has been cleared, destroyed or degraded previously, and an earlier baseline should be used, assessors must use the following approach in the metric:

- *use the pre-degradation habitat type as the site’s baseline*
- *note how this habitat type and condition has been determined*
- *account for the time between the habitat loss and compensation through the temporal risk function”*

Our advice is therefore that the baseline for the net gain calculation needs to be the site before the tree was removed

Summary:

An updated BNG calculation should be submitted to address the issues set out above.

Furthermore, a BNG Management plan has been submitted. This refers to the planting of a large tree and therefore is inconsistent with the metric calculation provided and the post development plans.