

Memo

To: Catrin Davies

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 24 March 2026

Re: Planning application ref: PL/25/1835

Address: 176 NORTHUMBERLAND AVENUE, READING, RG2 7PU

Description: :Proposed extensions and alterations to create 2 residential units (1-3bed and 1-4bed) with associated parking, cycle storage and refuse storage

The application site is a semi detached dwelling currently used as two flats. It is proposed to add a rear extension to the building that will allow the creation of two larger flats.

The ecology report (Jonty Denton, December 2025) concludes that the building is unlikely to host roosting bats or other protected species and as such that there would be no ecological objections to the proposals. However the submitted report includes numerous typos, unfinished and unsubstantiated statements, and in several places reads like a draft rather than a final report. As such the report should not be accepted in its current form. Please see the list below for examples of issues that will need to be corrected or clarified:

- a. *"According to the DEFRA's MagicMap, no EPS bat licences has been issued for properties within 1000m of the barn"* (there is no barn on the site)
- b. *"The nearest GCN return is from over 4m away in Spencer's Wood"* (while factually correct, the statement is meaningless)
- c. *"The field to the north is likely to support breeding skylark, and "* (This sentence is unfinished and appears unlikely particularly as there is no such field to the north)
- d. *"<https://www.bats.org.uk/advice/imworking-on-a-building-with-bats/ive-found-a-bat-during-works>"*. (the link provided does not work)
- e. *"There are no designated site withink 1km of the site"* (typo)
- f. *"... with an active cricket ground beyond..."* (there is no cricket ground near the site)
- g. *"There were signs of badger foraging on the grassland strip, but no signs of sett activity on or within 15m of the site boundary."* (Please clarify this statement. A Phase 1 habitat map has not been provided, as is normally expected with a Preliminary Ecological Appraisal, and it is not clear where the grassland strip is located)

An updated final version of the report is required addressing the above points and provided as a final document in PDF format. Until this is provided, the report is not considered to be of a

sufficient standard for the Council to rely upon for assessing the ecological status of the site.

Biodiversity Net Gain (BNG)

The application form states that the application is exempt from Biodiversity Net Gain due to the small area of habitats affected. Nonetheless the applicant has submitted a BNG calculation. To clarify, as less than 25m² of habitat would be affected by the proposals, the site would not be subject to BNG requirements

In any case the BNG calculation has been incorrectly completed, and given the site's location adjacent to a Green Link as per Policy EN12, it may be appropriate (should planning permission be granted) to include a condition requiring a native and friendly landscaping scheme to enhance biodiversity on the site.