

Memo

To: Catrin Davies

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 27 March 2026

Re: Planning application ref: PL/26/0199

Address: Land to the rear of 24-26 Wantage Road, Reading, RG30 2SE

Description: Proposed erection of 2no. semi-detached dwellings following demolition of the existing garages

The application site comprises the rear gardens of 24 to 26 Wantage Road. The site is located in a residential area of West Reading and the proposals are for the erection of two semidetached dwellings following demolition of the two outbuildings.

The application site has been subject to a number of recent planning applications including one for a single house (PA 231627/FUL) and more recently pre app advice was sought for a scheme similar to that currently submitted

Protected Species and Priority Habitats:

Given the urban location of the site and the nature of the outbuildings to be demolished, they are considered unlikely to host bats. However, a condition should be set to ensure that any clearance or demolition undertaken to facilitate the works should be carried out outside the bird nesting season (March – August).

Biodiversity Net Gain and Biodiversity Enhancements

From 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 plans provided show that the new houses will require the removal over 25 square metres of garden and as such the proposals would be subject to BNG requirements

The applicant has submitted a Small Sites BNG metric calculation along with a report (Reach Planning Solutions 5/1/2026), that shows the development will lead to a net gain in biodiversity of 0.08 Are Habitat Units equivalent to a net gain of 26%

Our advice however is that the calculation is incorrect and an updated calculation will need to be provided that addresses the following issues;

General Points

The spreadsheet should be completed in accordance with the Small Sites Metric (SSM) Guidance. If the metric is not completed correctly, the spreadsheet flags any errors in red. In this case, there are numerous red flags in the spreadsheet – these are used to highlight errors for correction

before submission.

For example – one such red flag refers to “invalid areas”. This error can be fixed by filling in all required information boxes within the metric – the “Desktop Assessment” page in this instance:

Development		
14. Select the type of proposed development. If Other provide details at Q.25 below	Residential	Site area must be less than 10,000 m2
15. Site area (m ²)	253	
N/A		
17. Number of dwellings proposed within the development site	Between 1 - 9 dwellings	

Designated sites and priority habitats		
18. Any designated sites on or within 500m of the site?		
19. Any priority habitats on or within 500m of the site?		
20. List the designated sites and/or priority habitats		

> 1. Introduction 2. Site Details 3. Desktop Assessment 4. Supporting Information 5. Area Habitats 6. Hedges & Lines of Tr

Another error refers to non matching habitat areas pre and post development. This is clearly identified in the spreadsheet with a red error flag which states that the “Error – Area of habitat creation must match area lost”

Furthermore:

- (a) No photos are included in the metric (there is a page called Supporting Information” that specially refers to the need for these)
- (b) There are no maps showing the existing and proposed habitats

Compliance with Metric Guidance

Turning to more specific errors, the current calculation does not comply with the Small Sites Metric guidance as :

- (a) The calculation includes two trees to be planted in the gardens.
- (b) All habitat within private gardens must be classed as “Vegetated garden”

Both of these issues are dealt with in the metric guidance, within the section on Private Gardens which reads:

[...]

The post-development private garden has no public access, and biodiversity net gains cannot be legally secured. As these gains cannot be secured you should only record habitats created within private gardens as either:

- ‘urban – vegetated garden’; or
- ‘urban - unvegetated garden’

When assessing habitat changes within a private garden, you should not:

- record the creation of any new habitats as anything other than ‘urban – vegetated garden’ or ‘urban – unvegetated garden’ habitat types
- record the enhancement of any habitats recorded within the baseline [...]

For reference, guidance on the SSM is provided here:

<https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides>

Other Issues:

The accompanying report includes a number of typos, for example:

garaug1es & hard1s2ta8nding

ga4menity law1n2

hawthorn priek

The report also includes a 3D view of the proposed scheme which shows habitats to the rear of the plot but the two trees are not on this along with the native hedgerow despite claims within the report and metric calculation.

Summary

Based on the above points and issues, the submitted BNG metric and documents are considered to be inaccurate and therefore the claim of a 26% net gain is unsubstantiated and cannot be relied on

The applicant should therefore submit an updated and corrected metric calculation and report addressing the points above . This is required to demonstrate that the development will achieve the required 10% BNG as required as well as satisfying EN12 of the local plan which requires that *“development should not result in a net loss of biodiversity”*