

Memo

To: Catrin Davies
From: Cathy Holwill (RBC Ecology Consultations)
CC:
Date: 8 May 2026
Re: Application ref: PL/26/0364

Address: Yeomanry House, 131 Castle Hill, Reading

Description: The conversion of the former Council offices of the Registry and Bereavement Service to 8 residential dwellings (5 apartments and 3 houses), associated tree works, internal and external alterations, repair works, removal of existing external staircase and extension to the eastern side of the Grade II Listed Property

The site comprises a listed property formerly used as the registry and Bereavement Service. It is proposed to convert the building into 8 residential dwellings. The site lies on a Green Link as per policy EN12.

Effect of development on wildlife

The ecology report (Luscinia Ecology, March 2026, ref: LUS26007PEA) concludes that the development is unlikely to adversely affect protected species or priority habitats.

However there are a few inconsistencies in the report that require clarification before the application can be fully commented on:

- (a) The report states (3.4) "A review of existing ecological knowledge of the Site and its surrounding area was undertaken on 16/09/2027. "
- (b) "this report is valid for a period of 18 months (i.e., the 02/04/28)." This doesn't appear to align with details of the survey date which is 10/02/2026
- (c) number of bat and bird box enhancement differ across the report : can this be clarified (section 5.46 v 1.5, and 5.41).
- (d) Appendix A seems to be missing from the contents page

Nonetheless, it would appear that the proposals are unlikely to significantly affect protected species and priority habitats.

[The inconsistency over the number of bat and bird boxes, can alternatively be addressed by a separate condition requiring biodiversity enhancements post development]

Furthermore, the report includes a number of mitigation, enhancement measures and recommendations– however these are scattered throughout the document and are not presented in a form that can be easily followed and therefore potentially secured by condition. In addition, the report states that "A Reasonable Avoidance Measures (RAMs) condition is recommended and will likely be required to secure the mitigation, compensation, and enhancement measures set" but no such document has not been provided.

Given the relatively small scale of the development, a full CEMP(biodiversity) would seem onerous - however securing these recommendations by condition would require a report that provides concise details of all ecological mitigation measures and precautionary working methods during construction works. These should be set out in such a way that it is clear what steps can be secured by planning condition and therefore easily followed on site during construction works.

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 BNG report (Luscinia Ecology, March 2026, ref: LUS26007BS&PEA) has been submitted concludes that the development will lead to net loss of 0.02 habitat units and a gain of 0.03 hedgerow units. Trading rules have not been satisfied.

The BNG assessment has been undertaken using an earlier version of the Statutory Metric (Version 4.) rather than the current version (version 4.1). As the BNG report was written in March 2026, it would appear to be more appropriate to have used an up to date version of the metric. This is relevant as it appears there are inconsistencies in how the size classes of the trees to be removed and retained have been assigned. For example the BNG report shows Tree T1 with a DBH of 65cm classed as Large size tree. However, version 4.0 of the Statutory metric guidelines defines trees of this size in the Medium class. As such it is unclear whether the tree size categories have been correctly assigned as per the relevant Statutory metric guidance and clarification is required.

Currently the baseline habitat cannot be confirmed and as the proposals currently show a small loss in habitat units that will require offsetting and the purchase of off site units, any changes to how the trees have been classed could have a significant effect on the overall BNG assessment.

Furthermore, the post development habitat map shows four new trees. One of these trees (south eastern corner) appears to be within a garden and therefore should not be included in the metric as per BNG guidance (vs 4.0 and 4.1).

Other issues (landscaping)

The proposed Landscaping plan does not differentiate clearly between new and existing trees on the plans and it would appear only two new trees are shown on this plan.

Conclusion

The baseline habitat in the BNG calculation cannot currently be verified and clarification of the baseline habitat assessment on site will need to be provided. The applicant should ensure that all proposed new trees are shown clearly and accounted for correctly in the post development habitat description.

An updated ecology report addressing the points listed above will also need to be provided.