

Memo

To: Catrin Davies

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 9 June 2026

Re: Planning application ref: PL/26/0582

Address: 58 BATH ROAD, READING, RG30 2AY

Description: Demolition of existing dwelling and erection of 5 detached houses with private and communal amenity space, driveway, parking and refuse stores

The application is for the erection of five detached dwellings on a site off Bath Road. The site currently comprises a detached bungalow with garage within a large garden. Access to the site will be provided via an existing access drive.

Planning History

Planning application PL/25/1030 [Erection of five detached 4-bed dwellings, and associated works, following demolition of detached bungalow] was refused last year and the decision upheld after appeal.

The plans appear to be very similar to those previously submitted .

(NB - the application form appears to have been completed incorrectly and states there will be a net gain of three dwellings - this should be four)

Protected Species

The same bat survey report from 2025 has been submitted –This relates only to the existing bungalow only and the later report which also included a bat roost assessment of the existing trees on site, will need to be submitted or updated as necessary. Nonetheless based on the information currently available, significant impacts upon bats are considered unlikely. Any impacts on nesting birds can be mitigated through a planning condition or informative for nesting birds.

Biodiversity Net Gain (BNG)

The proposals are subject to mandatory Biodiversity Net Gain as well as local policy requirements.

The site lies adjacent to a Green Link (Policy EN12 Biodiversity and the Green Network) which requires development to “*be maintained, protected, consolidated, extended and enhanced*” and “*should not result in a net loss of biodiversity*”. Policy H11 - Development of private Residential Gardens, also requires that developments avoid adversely impacting biodiversity, particularly where those gardens make an “*important contribution to biodiversity and contribute to the green network*”

An updated BNG calculation has been provided with an accompanying letter (Crossman Associates -23 April 2026) . The calculation demonstrates that the proposals will lead to a net loss of 0.7 area habitat units (AHU) , and a net gain of 0.01 linear habitat units. The proposals do not satisfy the required trading rules. A minimum of 1.00 AHU will need to be purchased to achieve a 10% net gain.

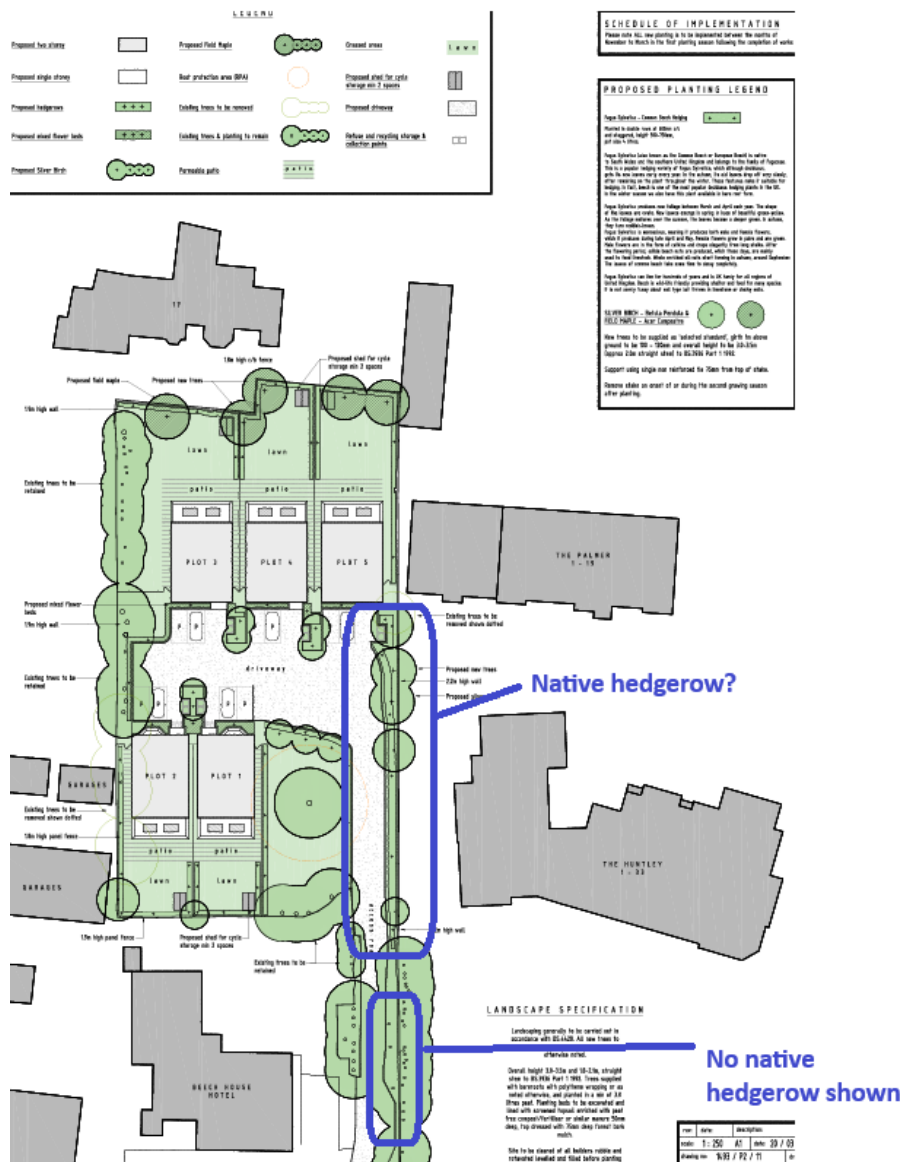
The post development maps show the main habitats as being building /hardstanding, private gardens and a community area. The community area comprises an area to the east of the Plots 1 and 2 and also the land identified along the walled access to the east of the site.

The baseline habitats appear to have been accurately accounted for in the calculation, however there are discrepancies and inconsistencies between the post development habitat maps provided, and the proposed landscaped plans.

1. Hedgerow: The BNG metric includes a 10m length of single species native hedgerow to be planted along the eastern boundary of the site: This is shown below:



However, the landscaping plans however do not show this hedgerow – instead a much longer length of beech hedge is identified to the north of this area:



The applicant should clarify this discrepancy and update the landscaping plans and BNG metric accordingly as the length shown as beech hedge is unlikely to also qualify as grassland, given that the strip appears to be mostly less than a metre wide

2. The landscaping plans show trees in the easternmost strip of land. Typically, where trees are located within communal areas rather than private gardens, they would be included within the BNG metric calculation. The applicant should clarify why these trees are not included in the BNG metric. As this strip is at most 2m wide at its widest point, it therefore seems unlikely that this tree planting can be realistically accommodated and therefore succeed.

Summary

Our advice is that the application should not be determined until updated BNG metric calculation and matching landscaping plan has been provided:

Even with a corrected calculation, the current proposals will lead to a significant loss of biodiversity which is likely to be unacceptable. It may be possible to reduce this loss by retaining some of the trees that are proposed for removal.

The Council will need to be sure that all opportunities to preserve and enhance biodiversity on site have been fully explored as required by the BNG hierarchy and EN12. – The BNG hierarchy requires that impacts on valuable habitats are avoided where possible, then minimised with compensation and off site provision only considered as a last resort, after these options have been fully explored. However, the BNG letter report states that “ *the proposed development will result in a net loss in habitat units. To achieve 10% net gain, 1.00 habitat units will need to be purchased*”. This suggests that the proposals are very dependent on off-site compensation without fully demonstrating that all reasonable efforts have been made to keep important habitats – such as the existing trees - or reduce the overall development footprint. Given the large loss of biodiversity, the Council will need to be satisfied that all proposed tree removals are necessary, that areas allocated for buildings and hardstanding are necessary, and that the proposed number of houses on the site is appropriate

It may be possible for example to reconfigure the layout of the houses, reduce the number of houses, or minimise the extent of hardstanding areas. These measures would help to reduce the large biodiversity loss.

Should the council decide that such a large loss of biodiversity on site is acceptable, it will need to then decide whether offsite provisions to mitigate this loss are appropriate. Details of the long-term management and maintenance arrangements for habitats contributing towards the Biodiversity Net Gain calculation including communal grassland, hedgerows and tree planting, should also be secured.