

# Memo

**To:** Anthony Scholes

**From:** Cathy Holwill (RBC Ecology Consultations)

**CC:**

**Date:** 19 June 2026

**Re:** Planning application ref: PL/26/0349

Address: Land adjacent Tilehurst Railway Station, Oxford Road, Tilehurst, Reading, RG31 6TH

Description: 3 storey, 2-bed dwelling house (self-build) including formation of an access to Oxford Road (A329), driveway, landscaping, and associated works

---

The application site is an area of land in Tilehurst adjacent to Tilehurst railway station. The site comprises a block of woodland and the proposals are for the erection of a three storey dwelling with access onto the Oxford Road. The site lies on a designated Green Link as per Local Plan policy EN12.

The site is bordered on two sides by a public footway.

This site was previously considered for development in 2014 when pre application advice was sought. Ecology comments provided in response were as follows:

*“The proposals will result in a loss of a block of broadleaved woodland and for the reasons set out below is very unlikely to be acceptable:*

*The NPPF, paragraph 117, states that:*

*“To minimise impacts on biodiversity and geodiversity, planning policies should: [...] promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets”*

*In this context priority habitats are Habitats of Principle Importance included in the England Biodiversity List (The Section 41 list) published by the Secretary of State under section 41 of the Natural Environment and Rural Communities Act 2006. The vast majority of the site is lowland mixed deciduous woodland which is on The Section 41 list and therefore a priority habitat as per the NPPF.*

*Reading Borough Council core strategy policy CS36 states that:*

*“On sites with recognised biodiversity or geological value [as is the case here], development will not be permitted where there would be a direct or indirect adverse impact on the site”.*

*The felling of a block of broadleaved woodland, which is a priority habitat, and its replacement with housing is therefore very unlikely to be in accordance with planning policy.”*

In relation to this application our previous concerns remain valid and are further reinforced by current policy requirements which underline the unacceptability of the proposals. These include

policy EN12 (Biodiversity and the Green Network) of the Reading Borough Local Plan in addition to strengthened national policy on the protection of Priority Habitats and ecological networks as set out in paragraphs 192 and 187 of the National Planning and Policy Framework (2024)

Since the pre-application response in 2014, local and national policy relating to biodiversity and Priority Habitats has been significantly strengthened, including the introduction of mandatory Biodiversity Net Gain.

The site comprises lowland mixed deciduous woodland which is a Priority Habitat as defined in the NPPF and is a vital part of a designated Green Link (Policy EN12)

Policy EN12 reads:

a) *The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. **Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:***

- **Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and**
- **Areas with potential for biodiversity value and which stitch the Green Network together – designated Local Green Space and open green spaces, and existing and potential Green Links.**

*New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.*

b) *On all sites, development should not result in a net loss of biodiversity and geodiversity, and should provide a net gain for biodiversity wherever possible. Development should:*

- *Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site, incorporating and integrating them into development proposals wherever practicable; and*
- *Provide new tree planting, wildlife friendly landscaping and ecological enhancements (such as wildlife ponds, bird and bat boxes) wherever practicable.*

*In exceptional circumstances where the need for development clearly outweighs the need to protect the value of the site, and it is demonstrated that the impacts cannot be: 1) avoided; 2) mitigated or; 3) compensated for on-site; then new development will provide off-site compensation to ensure that there is “no net loss” of biodiversity. Provision of off-site compensation shall be calculated in accordance with nationally or locally recognised guidance and metrics. It should not replace existing alternative habitats, and should be provided prior to development.*

Paragraph 192 of the NPPF (2024) reads:

*“ To protect and enhance biodiversity and geodiversity, plans should: [...]*

*b) promote the conservation, restoration and enhancement of priority habitats ,ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity [...]*”

and Paragraph 187 d) reads:

*187. Planning policies and decisions should contribute to and enhance the natural and local environment by: [...]*

*d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs; [...]*

The proposal will lead to the loss of an established block of woodland, a Priority Habitat as defined by the NPPF, to be replaced by building and hardstanding. The applicant has attempted to minimise the loss of woodland and therefore adverse impacts - however these measures do not alter the fact that a significant area of Priority habitat will be permanently lost.

The woodland forms part of a Green Link and therefore contributes to the functionality of the Green network. The loss of the woodland would lead to degradation and fragmentation of that Green Link and the proposals would therefore not comply with part (a) of the EN12 requirement that the Green Network ‘*shall be maintained, protected, consolidated, extended and enhanced* “. Instead, the proposal will lead to degradation of the Green Link and weaken its function.

Furthermore the proposals would not comply with EN12(b) which states that “*Development should Protect and wherever possible enhance features of biodiversity interest on and adjacent to the application site*” . Instead, the proposal will lead to a loss of biodiversity interest on the site

As such, the proposals would result in the loss and fragmentation of a Priority Habitat within a designated Green Link and are therefore unlikely to be acceptable as they would not comply with EN12 and the NPPF requirements to protect and enhance biodiversity and ecological networks. The concerns raised in 2014 at a pre application stage are therefore still valid and are now can be considered of increased importance given the strengthening of policies regarding biodiversity since then.