

Memo

To: Catrin Davies

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 15 June 2026

Re: Planning application ref: PL/26/0266

Address: 192 HENLEY ROAD, CAVERSHAM, READING, RG4 5LN

Description: The construction of a self-build two storey dwelling with associated parking and landscaping following demolition of existing garage

The application site comprises the garden to the rear of 192 Henley Rd. The site is on a designated Green Link as per local plan policy EN12 (Biodiversity and the Green Network). The site is surrounded by habitat suitable for use by commuting and foraging bats, including connected gardens that link open spaces with scattered trees within Reading Cemetery to the north and ancient woodland and Dingley Dell local Wildlife Site to the south.

The proposals include the erection of a dwelling in the garden with access onto All Hallows Road.

Biodiversity Net gain (BNG)

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 application form claims that the new house will be a 'self build' construction and as such is exempt from this requirement.

Regardless of the exemption, the site is on a Green Link and the development is subject to local planning policy EN12 and H11 and the applicant will need to show how the proposals comply with these policies:

EN12 (Biodiversity and the Green Network) which reads:

"On all sites, development should not result in a net loss of biodiversity"

[...]

"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."

Policy H11 (Development of Private Residential Gardens) which reads:

Proposals for new residential development that includes land within the curtilage or the former curtilage of private residential gardens will be acceptable where:

[.....]

The development provides biodiversity net gain wherever possible, and would not have an adverse impact on biodiversity in terms of the fragmentation of blocks of gardens, which as a unit or in association with adjacent green space are deemed to make an important contribution to biodiversity and contribute to the green network; ...

The applicant has submitted a BNG calculation and an accompanying statement by DJOGS (Landscape Architects) The statement and metric conclude that the development will lead to a net gain of 0.01 area habitat units (AHU's) equivalent to a net gain of 213.6%.

However, It is therefore very likely that the calculation is incorrect because there appears to have been pre-emptive clearance of the site, including the felling of a number of trees across the site.

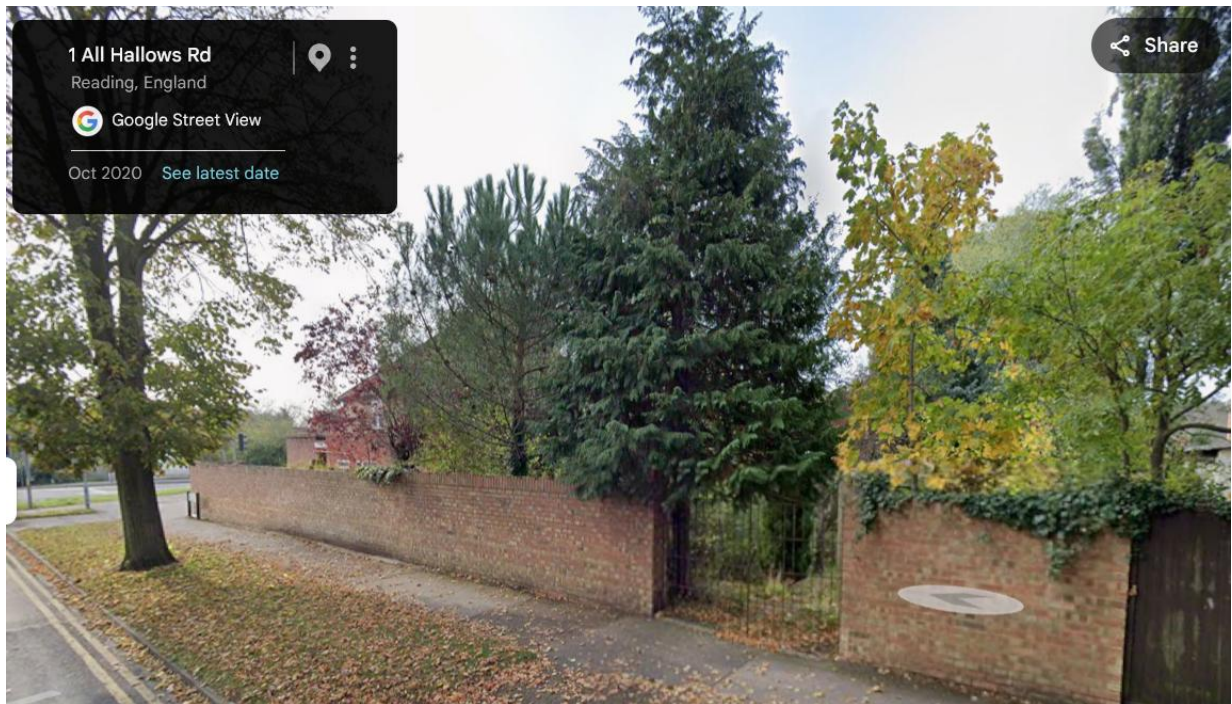
Historic imagery from 2020 indicates that the site supported substantial tree and garden vegetation. The statement provided states: *"The baseline habitat map confirms that the site has already been cleared and now consists mainly of developed and unvegetated surfaces with a small remaining grassed area"* .

As such the calculation has resulted in a baseline with an incorrect calculated baseline habitat value.

Aerial photos of the site (Google maps) show that the trees were present in April 2020



The view from Streetview along Allhallows Rd shows the vegetated garden, with trees within, later in the year (October 2020)



Our advice is that the baseline on which the BNG calculation is made should be taken as that before the recent clearance of trees and other garden vegetation.

To include the trees (and other habitats) in the baseline would be in accordance with the Environment Act which reads:

“Pre-development biodiversity value

5(1) In relation to any development for which planning permission is granted, the predevelopment biodiversity value of the onsite habitat is the biodiversity value of the onsite habitat on the relevant date.

(2) The relevant date is—

(a) in a case in which planning permission is granted on application, the date of the application, and

(b) in any other case, the date on which the planning permission is granted.

(3) But the person submitting the biodiversity gain plan for approval and the planning authority may agree that the relevant date is to be a date earlier than that specified in subparagraph (2)(a) or (b) (but not a date which is before the day on which this Schedule comes into force in relation to the development).

(4) This paragraph is subject to paragraphs 6 and 7.

6 If—

*(a) a person carries on activities on land on or after **30 January 2020** otherwise than in accordance with—*

(i) planning permission, or

(ii) any other permission of a kind specified by the Secretary of State by regulations, and

(b) as a result of the activities the biodiversity value of the onsite habitat referred to in paragraph 5(1) is lower on the relevant date than it would otherwise have been, the pre-development biodiversity value of the onsite habitat is to be taken to be its biodiversity value immediately before the carrying on of the activities.

7 Where planning permission is granted in respect of land which is registered in the biodiversity gain site register under section 100 of the Environment Act 2021, the predevelopment biodiversity value of the land is the total of—

- (a) the biodiversity value of the onsite habitat on the relevant date, and
- (b) to the extent that it is not included within that value, the biodiversity value of the habitat enhancement which is, on that date, recorded in the register as habitat enhancement to be achieved on the land.”

(Unless the trees were felled in accordance with “planning permission” or “any other permission of a kind specified by the Secretary of State by regulations” [such as a felling licence] – which does not appear to be the case.

In addition, the NPPG reads:

“It may also be relevant to consider whether any deliberate harm to this biodiversity value has taken place in the recent past, and if so whether there are grounds for this to be discounted in assessing the underlying value of the site (and so whether a proposal would achieve a genuine gain).

And the DEFRA Metric user guide which reads:

“If a habitat has been cleared, destroyed or degraded previously, and an earlier baseline should be used, assessors must use the following approach in the metric:

- *use the pre-degradation habitat type as the site’s baseline*
- *note how this habitat type and condition has been determined*
- *account for the time between the habitat loss and compensation through the temporal risk function”*

Therefore, the baseline for the net gain calculation needs to be the site before the trees and other vegetation were removed and an updated net gain calculation should be submitted.

Summary

The applicant should be asked to submit an updated net gain calculation, using the current DEFRA metric to demonstrate how a net gain in biodiversity units will be achieved. The baseline will need to be the site before the trees were removed and other clearance carried out. The Biodiversity Net Gain metric spreadsheet should be supplied along associated maps, management plans, habitat condition assessment sheets etc. If the calculation shows that there will be a loss in habitat or linear Biodiversity Units, it may be necessary for the scheme to be modified to ensure that it does not.