

Memo

To: Anthony Scholes

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 8 June 2026

Re: Application ref: PL/26/0666

Address: 70 WHITLEY STREET, READING, RG2 0EQ

Description: Erection of 2no. single-storey one-bedroom dwellings

The site comprises an area of land to the rear of the former Wellington Arms on Whitley Street in Reading. The site is located in a predominantly urban location of Reading. It is proposed to erect a single storey building split into two dwellings .

Effect of development on Wildlife:

The ecology report (Jonty Denton, April 2026) concludes that the development is unlikely to affect protected species or priority habitats subject to further clearance being undertaken under mitigation for breeding birds. Although the site was clear of vegetation in winter 2025/6 , this has subsequently re established itself and both the vegetation and the existing building have the potential to host nesting birds. Any clearance should be carried out outside of the bird nesting season – these measures could be secured through a planning condition.

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 calculation (Jonty Denton, March 2026) concludes that the development will lead to net loss of -100%. Furthermore, trading rules have not been satisfied.

As such the development would not comply with local plan policy EN12 which states that

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.*

The report states that 0.0044 Area habitat Units (AHU) will be required to achieve a 10% gain. It is unclear how this BNG will be achieved as the entire site will be converted to hardstanding with no

apparent space for planting. This is considered unacceptable and the plans should be revised to show some attempt at increasing the biodiversity of the site.

It seems the proposed ground floor plan appears to show some green planting adjacent to the cycle shed.. I am unsure why this would not be included in the BNG calculation?

There are a few issues with the BNG metric calculation:

- (1) **Site area calculation:** The BNG calculation says the area of the site is 158m² – however the existing and proposed block plan says it is 170m²
- (2) **BNG Metric:** includes the following explanatory entry within the proposed habitats tab in the metric: “*Green Area (including wild flower meadow, grass at entrance and to the southeast of site, behind cars)*” – please can this be reviewed as it does not appear to correspond to any of the submitted plans
- (3) **Woodland discrepancy:** The Desktop assessment page states that woodland is present 438m to the north. This would appear to be incorrect as the ecology report refer to woodland 340m to the southwest.

Conclusion

While the matters for clarification listed above are not considered to be a significant constraint to the development and in themselves, warrant a reason for refusal of the application, the proposal itself fails to comply with local policy EN12. The proposals will lead to loss of biodiversity, and the no onsite habitat creation or ecological enhancements are included with the plans. In the absence of sufficient evidence demonstrating compliance with EN12 and the BNG requirements the proposal would not be supported from an ecological point of view