

Memo

To: Catrin Davies

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 2 July 2026

Re: Planning application ref: PL/26/0742

Address: 67 AMBLECOTE ROAD, TILEHURST, READING, RG30 4BS

Description: Single storey extension and associated alterations to create a separate one-bedroom residential dwelling and associated work

The application site comprises a detached bungalow and garage surrounded by habitat suitable for use by foraging and commuting bats, including connected gardens with tree lines connecting to grassland and woodland within Prospect Park Local Wildlife Site to the south and woodland in the wider landscape. The site lies adjacent to a Green Link as per Policy EN12. The plans include the demolition of the garage as well as the addition of a single storey extension to create a separate residential dwelling.

Given the age and construction of the existing buildings and the proximity of suitable bat habitat, insufficient information has been provided to determine whether the buildings have potential to support roosting bats. The bungalow and the garage may contain features suitable for use by roosting bats and as such, there is a reasonable likelihood that the proposals may affect roosting bats. As a bat survey has not been submitted it is therefore not possible to adequately assess the impacts of the scheme on bats which are a protected species. It is therefore not possible to determine whether the proposals comply with relevant legislation and planning policy.

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 applicant has stated in the DAS that the proposals are not subject to BNG as the proposals will lead to a total net loss of less than 25m². The applicant appears to have misunderstood the basis of the de minimis exemption which relates to the extent of habitat affected by development rather than the net habitat value after development. For reference the de minimis exemption from mandatory Biodiversity Net Gain generally applies where development does not impact less than 25 m² of area habitat or less than 5 metres of linear habitat (for eg hedges)

As more than 25 m² of on-site habitat will be affected, the proposals do not appear to meet the de minimis exemption and a BNG assessment is required.

No Biodiversity Net Gain assessment has been submitted and currently there is insufficient information to demonstrate compliance with mandatory BNG requirements or with local plan policies H11 and EN12.

Summary

No bat survey has been submitted. As such it is not possible to assess the impacts of the proposals on bats which are a protected species and a material consideration in the planning process.

Furthermore insufficient information has been submitted to demonstrate compliance with mandatory BNG requirements. The applicant has incorrectly argued that the de minimis exemption applies to the scheme and therefore no BNG calculation and assessment has been submitted. As such, it is not possible for the Council to conclude that the proposals will comply with local and national planning policy.

For these reasons, the application is not supported as insufficient ecological information has been submitted.