

Memo

To: Marcelina Rejwerska

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 9 July 2026

Re: Planning application ref: PL/26/0863

Address: 2 CONISBORO WAY, CAVERSHAM, READING, RG4 7HT

Description: Demolition of existing dwelling house and construction of replacement dwelling house

The application site comprises a bungalow within a garden in a residential area of Caversham. It is proposed to demolish the house and outbuilding and replace with a much larger dwelling with detached annex in the northern area of the garden.

The site is surrounded by habitat suitable for use by bats and other protected species, it is surrounded by trees and hedges and adjacent to a small area of woodland. As such there is a risk that the proposals may impact upon protected species and habitats. No up to date ecological appraisal of the site has been submitted to support the application.

An ecological appraisal (comprising an extended Phase 1 Habitat and Species Scoping Survey, and any phase 2 surveys) will need to be submitted prior to the determination of the application.

Survey requirements

Surveys should be carried out by suitably experienced ecologists who are a member of a professional organisation such as the Chartered Institute of Ecology and Environmental Management and / or are licensed or accredited by Natural England to survey protected species.

Extended phase 1 habitat & protected species scoping survey

An Extended Phase 1 Habitat Survey is a standardised technique for environmental audit and involves classifying and if required mapping habitats on and adjacent to the application site. The survey is then 'extended' and any features or habitats that are likely to be of importance for notable or protected species, and or prove to be a constraint to development are investigated further and described.

Phase 2 ecology surveys

If the surveys show that the site contains habitats suitable for protected species further surveys for species such as reptiles may need to be carried out

Bat survey

A presence / absence bat survey is normally undertaken in two stages, firstly a preliminary roost assessment (or bat roost potential survey), whereby the inside and outside (from ground level) of

the building and any trees to be removed is thoroughly searched for bats and signs of bats, this survey can be undertaken at any time of year. If no signs of bats and few features such as cracks and crevices in which bats could roost are found and the building and/or trees have negligible potential to host roosting bats then further surveys will not be required. However, if bats are found or the buildings and/or trees have features suitable for use by roosting bats, further emergence surveys during the bat active season (i.e. between May and the end of August/ sub optimally until mid-October) may need to be carried out to confirm the presence or absence of bats and, if bats are present, to characterise the roost and establish mitigation requirements.

It is noted that the applicant has submitted a document detailing the results of bat emergence surveys. These were undertaken four years ago in 2022 and therefore cannot be relied upon to inform determination of the current planning application (ecological survey information must be sufficiently up to date to reflect the ecological conditions on the site) please see the document attached detailing the validity of ecological surveys.

Planning policy

Paragraph 99 of the government Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System (this document has not been revoked by the National Planning Policy Framework) states that:

“It is essential that the presence or otherwise of protected species, and the extent that they may be affected by the proposed development, is established before the planning permission is granted, otherwise all relevant material considerations may not have been addressed in making the decision. The need to ensure ecological surveys are carried out should therefore only be left to coverage under planning conditions in exceptional circumstances, with the result that the surveys are carried out after planning permission has been granted.”

In this case, since the extent to which protected species will be affected by the proposals has not been established, and there appear to be no “exceptional circumstances”, the application would not be in accordance with the above planning policy.

Summary

The application site may contain habitats that are suitable for use by protected species and surveys to confirm their presence or absence will need to be undertaken. These surveys and any mitigation plan will need to be submitted prior to the determination of the application, or the application should be refused on the grounds that insufficient information has been provided for the council to determine the likely impact of the proposals upon protected species. The applicant should be aware that some ecology surveys are seasonal and should ensure that factor this into their timeframes for the project.

Currently the application does not comply with Circular 06/2005, and as such, insufficient information has been provided for the LPA to determine the application.

Biodiversity Net Gain (BNG)

In relation to local policies regarding biodiversity, the site lies adjacent to a Green link as per Policy EN12 (Biodiversity and the Green Network) which 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, 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.

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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.

Furthermore, Local Policy H11 reads:

[...] 8) 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; and [...]

Although, the applicant has stated that the development is exempt from mandatory BNG requirements no BNG assessment has been submitted and currently there is insufficient information to demonstrate compliance with local plan policies H11 and EN12.

Summary

No up to date ecology survey information has been submitted with the current application. As such it is not possible to assess the impacts of the proposals on bats and other protected species which are a material consideration in the planning process.

Furthermore insufficient information has been submitted to demonstrate comply with local and planning policies EN12 and H11

For these reasons, the application is not supported as insufficient ecological information has been submitted. THE LPA cannot adequately assess the impact of the proposed development and therefore the application should be refused on the grounds on insufficient ecological information