

Memo

To: Marcelina Rejwerska

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 22 July 2026

Re: Planning application ref: PL/26/0801

Address: 98 CONISBORO AVENUE, CAVERSHAM, READING, RG4 7JF

Description: Erection of a new dwelling.

The application site comprises the garden of an existing dwelling in residential area of Caversham, Reading where it is proposed to erect a new dwelling (access from the west)

The site has been subject to a previous application for a new dwelling on the land (PL/24/0054) which was refused for a number of reasons including loss of biodiversity. An appeal was subsequently dismissed.

Effect of development on Wildlife.

The applicant has provided a short letter report of the land stating that the site has not changed since the previous ecology full report undertaken in November 2023 (NKM Associates). The habitats on site are of limited ecological importance the report concludes that the risk of impacting upon protected species is minimal. The risk can be maintained or even further reduced if the mitigation strategy outlined in Section 4.0 of the report is adhered to. As such, subject to the condition below, there would be no objections to this application on ecology grounds – suggested wording is provide below.

Biodiversity Net Gain and Biodiversity Enhancements

The applicant has submitted a Biodiversity Net Gain letter (NKM Associates Ltd, dated 27 April 2026) and supporting Small Sites Metric calculation. The letter states that the development is a self build development and is therefore exempt from the Biodiversity Gain Condition. Whilst the proposed development is exempt from mandatory net gain, it still needs to be considered against policy EN12 of the Reading Local Plan. Essentially, this policy seeks to ensure that development does not lead to a net loss of biodiversity and provides a net gain where possible.

EN 12 reads:

“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.”

le that the site should be assessed against the statutory metric and shown to deliver no net loss in BNG units.

The letter report shows that the application will lead to a net loss of biodiversity of 0.0764 Area Habitat Units (AHU), equivalent to a net loss of -23.35%. Hedges will remain and therefore no net loss of hedgerow units is expected.

The letter report states that 7 trees will be planted on site. However, trees planted in private gardens do not count towards post development BNG as per the BNG guidance. When these trees are excluded, the overall loss in biodiversity is approximately 0.1 AHU (rounded to the nearest decimal place). Therefore the proposals do not comply with EN12.

As such, should the loss of biodiversity be considered acceptable, it is recommended that condition is included to ensure that evidence is provided to demonstrate how the biodiversity loss will be compensated for prior to occupation for the condition. This should be secured via a condition or obligation requiring the applicant to submit a certificate from a registered biodiversity offsetting scheme showing a no net loss (i.e. 0.1 AHUs).

In addition to addressing the identified biodiversity loss, new tree planting and other ecological enhancements such as integrated bat and bird boxes and native and wildlife friendly planting should also be secured via a planning condition. Suggested wording provided below:

Conditions

Condition: The development hereby approved shall be implemented strictly in accordance with the precautionary measures stated in Section 4 of the Preliminary Ecological Appraisal (NKM Associates, dated April 2023).

Reason: To minimise the ecological impacts of development in accordance with Policies EN12 and the NPPF.

Condition: Prior to commencement of the development, details of biodiversity enhancements, to include a minimum of one bird and one bat box, brick or tile built into the walls of the new building and native and wildlife friendly landscaping shall be submitted and approved in writing by the council. A brief letter report confirming that the boxes, bricks or tiles have been installed, including a simple plan showing their location and photographs of the boxes, bricks or tiles in situ, is to be submitted to and approved in writing by the Council prior to occupation

Reason: To incorporate biodiversity improvements in and around developments in accordance with paragraph 193 of the NPPF and policy EN12 of the Reading Local Plan (2019)