

Memo

To: Catrin Davies
From: Cathy Holwill (RBC Ecology Consultations)
CC:
Date: 28 July 2026
Re: Application ref: PL/26/0364

Address: Yeomanry House, 131 Castle Hill, Reading

Description: The conversion of the former Council offices of the Registry and Bereavement Service to 8 residential dwellings (5 apartments and 3 houses), associated tree works, internal and external alterations, repair works, removal of existing external staircase and extension to the eastern side of the Grade II Listed Property

The site comprises a listed property formerly used as the registry and Bereavement Service. It is proposed to convert the building into 8 residential dwellings. The site lies on a Green Link as per policy EN12.

To address our previous comments (May 2026) the applicant has submitted a revised Biodiversity Net Gain (BNG) calculation and supporting Biodiversity Statement and Draft Biodiversity Gain Plan (Luscina Ecology, July 2026, ref: LUS26007 BS&BGP)

A number of our comments have been addressed. However, there remain a number of issues to be resolved in addition to our previous comments relating to other parts of the submission.

- The metric and assessment are now based on version 4.1 of the Statutory Biodiversity Metric tool. However, there appear to be inconsistencies between the report and the submitted metric calculation.
- the calculation shows a net gain of 0.04 Area habitat units whereas Section 6.2 of the report refers to a net gain of -0.04 Habitat units. The report will need to be updated to ensure it accurately reflects the metric calculation
- The spreadsheet includes incomplete fields:

Area habitat summary									
Total Net Unit Change	0.04								
Total Net % Change	3.48%								
Trading Rules Satisfied	No - check trading summaries ▲								
Area Check	Area Acceptable ✓								

Post intervention habitats									
Proposed habitat	Area (hectares)	Distinctiveness	Condition	Strategic significance	Temporal multiplier	Final time to target condition (years)	Difficulty	Habitat units delivered	
Modified grassland	0.0272	Low	Moderate	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	4	Low	0.09	
Developed land, sealed surface	0.0913	Low	Low - Check	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	0	Low	0.00	
Vegetated garden	0.0348	Low	Condition Assessment N/A	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	1	Low	0.07	
Introduced shrub	0.005	Low		Check details - is there evidence that habitat has reached target condition? A					
Urban tree	0.004071504	Medium	Moderate	Area/compensation not in local strategy/ no local strategy	Standard time to target condition applied	27	Low	0.01	
Total habitat area	0.16							0.17	
Site Area (Excluding area of individual trees, green walls, intertidal hard structures)	0.16								
M² to hectares conversion tool:	Select a unit	Hectares	M²						

It should be noted that when this row is completed, the net gain increases - nonetheless

- the spreadsheet should be completed correctly
- (d) The baseline habitat map shows a new tree T16. However, the post development habitat map shows the same feature as G16. This presumably is an error but results in different habitat references across the plans
 - (e) Comments in the metric suggest that four new trees will be planted – however this is misleading and incorrect. Only one new tree is shown on the post development map. The applicant should update the comment and ensure that habitat plans and the submitted metric agree with each other

Finally the submitted biodiversity metric relies upon a newly planted tree to the north of the site to achieve the post-development biodiversity value. The report concludes that there is no need for a Habitat Management and Monitoring Plan (HMMP) but no further justification for this statement is provided. The applicant will need to provide justification of why an HMMP is not required or alternatively provide details of how the establishment, management and long-term retention of proposed habitat features will be secured.

Nonetheless, with the exception of what appears to be a typo in the baseline habitat plan, it would appear that the baseline habitats have been evaluated correctly. Other issues relate mainly to post development proposals and these matters can be addressed through the Biodiversity Gain Condition and it is not essential that they are finalised at this stage. Corrected post development habitat plans that are consistent with the landscaping scheme and corrected biodiversity metric should therefore be provided as part of the Biodiversity Gain Plan

The development will be subject to the Biodiversity Gain Condition which requires the submission and approval of a biodiversity gain plan and an informative to this effect should be included on the decision notice.

Other issues:

In the absence of an updated ecology report that addresses and clarifies the issues raised and detailed in our previous memo should you be minded to approve the application, our recommendation is that the following conditions are imposed.

***Condition 1:** No development shall take place (including demolition, ground works, vegetation clearance) until a construction environmental management plan (CEMP: Biodiversity) based on the recommendations and mitigation measures set out within the submitted ecological report, has been submitted to and approved in writing by the local planning authority. The CEMP (Biodiversity) shall include the following.*

- a) Risk assessment of potentially damaging construction activities.*
- b) Identification of “biodiversity protection zones”.*
- c) Practical measures (both physical measures and sensitive working practices) to avoid or reduce impacts during construction (may be provided as a set of method statements).*
- d) The location and timing of sensitive works to avoid harm to biodiversity features.*
- e) The times during construction when specialist ecologists need to be present on site to oversee works.*
- f) Responsible persons and lines of communication.*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person.*
- h) Use of protective fences, exclusion barriers and warning signs.*

The approved CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with the approved details, unless otherwise agreed in writing by the local planning authority.

Reason: To minimise impacts on biodiversity in accordance with the NPPF.

Condition 2: Prior to occupation of the development, four bird and four bat boxes, bricks or tiles are to be installed on or around the site under the supervision of a suitably qualified ecologist. 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.

Reason: To incorporate biodiversity improvements in and around developments in accordance with paragraph 193 of the NPPF

Condition 3: The development hereby permitted shall not be occupied until a report detailing the external lighting scheme and how this will not adversely impact upon wildlife has been submitted to and approved in writing by the LPA. The report shall include the following figures and appendices:

- A layout plan with beam orientation
- A schedule of equipment
- Measures to avoid glare
- An isolux contour map showing light spillage to 0.5 lux.

The approved lighting plan shall thereafter be implemented as agreed.

Reason: To limit the impact of light pollution from artificial light on nature conservation in accordance with para 191 of the NPPF

Informative:

Please note that this permission is has been granted subject to the statutory condition ("the biodiversity gain condition") that development may not begin unless:

- (a) a Biodiversity Gain Plan has been submitted to the planning authority, and
- (b) the planning authority has approved the plan.

Failure to submit a Biodiversity Gain Plan prior to the commencement of development is a breach of planning consent and may lead to formal enforcement action being taken that will require all development on site to cease.

You should ensure that works do not commence until Biodiversity Gain Plan has been submitted to and approved in writing by the council and "the biodiversity gain condition" has been discharged.