

Memo

To: Anthony Scholes

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 18 September 2026

Re: Planning application ref PL/26/1099

Address: CLAYFIELD COPSE PAVILION, CAVERSHAM PARK ROAD, CAVERSHAM, READING

Description: External works to the existing sports pavilion comprising an insulated render system and render finish to the external walls; a new permeable paved terrace with associated landscaping; siting of a replacement storage container on screw pile foundations; and erection of a palisade-fenced goal storage enclosure to the rear

The application site comprises a pavilion located at Clayfield copse in Caversham. It is proposed to renovate the existing pavilion – the plans include a new permeable paved terrace to the front of the pavilion, a large area of gravel enclosed by a laurel hedge on existing grassland, palisade fencing to the rear for storage purposes and the placement of a 40ft long storage container to the north east of the site close to a tree.

The site is also located close to mature trees and vegetation to the rear of the pavilion, together with a feature identified on mapping as a ditch. The ditch is lined with mature trees and is likely to be used by protected species including bats. The shipping container will be located approximately 5metres from this ditch and the new fencing will be located 3 metres away at its closest point.

Biodiversity Net Gain

The application form states that the application is not subject mandatory BNG as the site will involve the loss of less than 0.2hectares of land and this would appear to be the case. However while the application is not subject to mandatory net gain, it is subject to the requirements of local plan policy EN12 which states that there should be no net loss in biodiversity

EN12 reads:

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.

The proposals will therefore need to satisfy the requirements of Policy EN12 as the development will result in the loss of existing grassland to be replaced by an increased area of hardstanding and gravel. The applicant will need to submit a biodiversity metric calculation to demonstrate that the proposals will lead to no net loss of biodiversity and therefore comply with EN12.

Impacts on Protected Species and Priority Habitats

There are a few issues within the Design and Access Statement (DAS) that need to be clarified :

- The DAS states “The woodland areas to the west, north and east are separated from the works by sufficient distance that no impact on those designated areas arises, and no impacts on protected species were identified at pre-application stage : “ However, the pre app ecology response did not conclude that there would be no impacts on protected species. Furthermore, this statement does not appear to have acknowledged the mature tree lined drainage ditch less than ten metres to the south of the pavilion.
- The document refers to “. The new native laurel hedgerow “. Please could the applicant clarify what they mean by “native laurel”. Most laurels used for hedging tend to be non native species and can spread easily into the wild. Given the location of the pavilion close to ancient woodland, the use of laurel unlikely to be acceptable and a more appropriate native wildlife friendly hedgerow should be used instead. The DAS explains that laurel has been chosen because of Sport England requirements which read: “Sport England advised that deciduous planting should not be located adjacent to playing surfaces owing to maintenance implications”. However as the laurel hedgerow will be set back from the pitches, it is unclear why a laurel hedge in this location is needed.
- The DAS states “The new laurel hedgerow and the climbing plants to the container both add habitat on site, and any residual net gain requirement is proposed to be delivered on site.” It is not clear what is meant by this statement in the context of the exemption from mandatory BNG. Furthermore please note that area habitats and linear are considered separately within the biodiversity metric assessment and the addition of hedgerow (or climbing plants as proposed for the container unit) cannot be used to compensate for the loss of an area habitat such as grassland. The proposals will still need to demonstrate no net loss of biodiversity as per EN12 requirements.

Other matters:

The application form also states that there are no priority habitats within 500metres of the site, however this would appear to be incorrect as 136m to the west lies an area of Ancient woodland known as Blackhouse Wood. The DAS however, correctly identifies the nearby ancient woodlands and their status as a Local Wildlife Sites and Priority Habitat.

There appear to be no plans submitted for external lighting. The woodlands and the tree lined ditch to the rear of the pavilion are very likely to be used by foraging and commuting bats and other nocturnal wildlife. Artificial light at night can have a significant and adverse impacts on invertebrates, bats, birds and other nocturnal wildlife. No external lighting should therefore be installed as part of the development. This can be resolved by a condition once the issues above have been resolved.