
MEMORANDUM

From:	Tina Cuss Ecology Officer		
Service	WBC Ecology	App No:	260751
Address:	Land and garages to the North East side of Headley Road, Woodley, Reading, RG5 4JG.		
Proposal:	Full application for the proposed erection of 1no. 2 bedroom dwelling to include 3no. dormers, with garden and parking following demolition of existing garages.		
Type of Development:	Minor Dwellings (1-9)		
Site Visit Made:	Yes		

Summary Of Recommendations

- ☐ No comment
- ☐ No objection
- ☐ No objection subject to conditions (and reasons) **stated below**
- ☐ Request further information before determination as **stated below**
- ☐ Objection due to the reason(s) **stated below**

Comments On Proposal

I have read the Ecological Assessment (GS Ecology, Ref ECO4028, March 2026), Biodiversity Net Gain Calculation (GSE, Ref ECO4028b, March 2026), Tree Survey and Arboricultural Impact Assessment (GHA Trees, Ref GHA/DS/160491:26, January 2026) and Design & Access Statement (Colony, Ref 1098, March 2026). I have also reviewed the plans, elevations and renders submitted in support of the application).

The applicant has not submitted AIA Appendix A the Site Plan / Arboricultural Impact Plan, a Biodiversity Metric or a degradation statement to take account of the line of Leyland cypress and Sycamore trees which have been pruned/lifted to facilitate the development.

Ecological Assessment

The application site is assessed as comprising of a hardstanding access drive and yard with a block of four former prefabricated garages and three small sycamore trees in the northeastern corner. The Ecologist states the ornamental cypress hedge at the western boundary is overgrown with ivy, approximately 5m in length and shared with the neighbouring property. They assume that it is to be retained. However, the Ecologist has failed to include the overhang of Cypress hedge in the metric summary or shown it in the Phase 1 Habitat Survey Plan or pre-development habitat plan in the BNG Calculation report.

According to the Arboricultural Impact Assessment (AIA) T3 and T5 have clearance of 6m above ground level. T4 has 4m clearance. From 2023 Streetview photos it is apparent the canopy of the trees has been lifted. Thus, habitat for breeding birds has been cleared and degraded prior to submission of the application. The Arboriculturist recommends the crown of the Cypress is further to 8m.

AIA GHA/DS/160491:26 recommends that three groups of Sycamore G2a, G2b and G2c in the northeastern-most corner be removed. Habitat Type after Development Plan in appendix 4 of the BNG Assessment proposes permanent retention of the 3 trees categorized by the Arboriculturist as Category C1, self-set trees recommended for removal. The AIA does not include a Tree Survey or a Tree Protection Plan. In order to recommend approval, the amended Proposed Site Plan Rev 3 / Existing Block Plan with Trees (Colony, 26 May 2026) should be further amended to show if G2b and G2c in particular are proposed to be retained. As no detail of root protection is provided, I assume the Applicant proposes G2a is felled to facilitate the development. In order to approve the application appendix 4 of the AIA should be provided and the applicant must clarify which trees will be protected and retained in the long-term.

Proposed Site Plan Rev 03 does not include details of the native mixed planting or size and species of native trees proposed. If the application is approved the ecological compensation and enhancements recommended in PEA section 4.15 for integration of bird and bat boxes into the walls new house and native tree and shrub planting should be included in the detailed proposals and secured by planning condition.



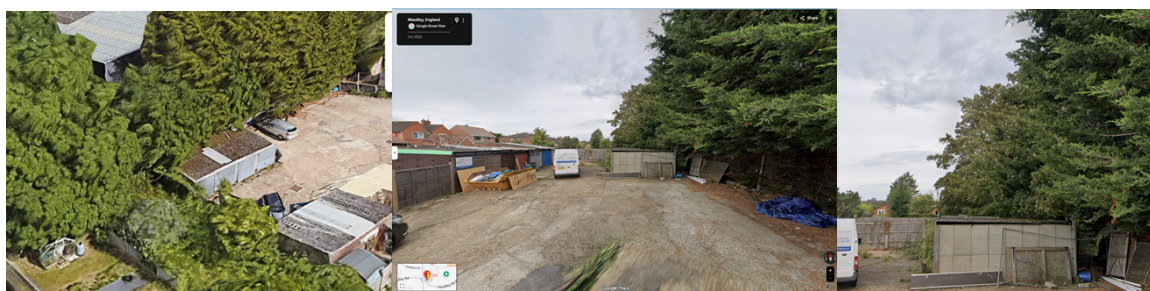
Biodiversity Net Gain Calculation

I must disagree with BNG Calculation report Table 1 that No activities have been carried out prior to the survey that have resulted in the loss of on-site biodiversity value. The Ecologist has not reviewed the available 2023 Streetview photos or aerial photos of the site which show crown lifting of the Cypress hedge trees and clearance works to the G2a,b & c Sycamores. The Cypress overhang, or overhung in 2020 the site, but have not been included in the metric. While Table 1 states a completed Statutory Metric tool is provided with the Biodiversity Net Gain report the agent has failed to submit this metric. I therefore can't agree that the metric summary sheet provided in Appendix 2 of the BNG Calculation is accurate and the development qualifies under the de minimis exemption or that the development would result in a

54.56% increase in biodiversity habitat units.

Table 1 – Statutory BNG minimum information requirements

Minimum information	Response for this application
1) Confirmation that the applicant believes that planning permission, if granted, the development would be subject to the biodiversity gain condition;	No, this development would not be subject to a biodiversity gain condition, as the proposals are subject to the de minimis exemption (see below)
2) The pre-development biodiversity value(s), either on the date of application or earlier proposed date (as appropriate);	See completed Statutory Metric tool provided with this report.
3) Where the applicant proposes to use an earlier date, this proposed earlier date and the reasons for proposing that date;	02 March 2026 – the date of the survey
4) The completed metric calculation tool showing the calculations of the pre-development biodiversity value of the onsite habitat on the date of application (or proposed earlier date) including the publication date of the biodiversity metric used to calculate that value;	Provided with this report
5) A statement whether activities have been carried out prior to the date of application (or earlier proposed date), that result in loss of onsite biodiversity value ('degradation'), and where they have: - a statement to the effect that these activities have been carried out; - the date immediately before these activities were carried out; - the pre-development biodiversity value of the onsite habitat on this date; - the completed metric calculation tool showing the calculations, and - any available supporting evidence of this;	No activities have been carried out prior to the date of survey that have resulted in the loss of onsite biodiversity value.
6) A description of any irreplaceable habitat (as set out in column 1 of the Schedule to the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations 2024) on the land to which the application relates, that exists on the date of application, (or an earlier date); and	There are no irreplaceable habitats on the land to which the application relates
7) Plan(s), drawn to an identified scale and showing the direction of North, showing onsite habitat existing on the date of application (or earlier proposed date), including any irreplaceable habitat (if applicable).	See Appendices 3 and 4



Photos 9 and 10 – The three small sycamore trees within the application site – to be retained.



Local Plan policy CP3 states planning permission will be granted for proposals that:
d) maintain or enhance the ability of the site to support fauna and flora including protected species; ..and
f) Contribute to a sense of place in the buildings and spaces themselves and in the

way they integrate with their surroundings (especially existing dwellings) including the use of appropriate landscaping.

According to MDD Policy TB23 planning permission for development proposals will only be granted where they comply with policy CP7 – Biodiversity of the Core Strategy and also demonstrate how they provide opportunities, including through design, layout and landscaping to incorporate new biodiversity features or enhance existing, and ensure that all existing and new developments are ecologically permeable.

To demonstrate the de minimis exemption does apply the applicant should provide the information referred to in Table 1 which has been omitted and that the hedgerow and the tree works and removal has been into account. If the application is approved to compensate the removal and net loss of biodiversity habitat a native species tree and shrub landscaping scheme and retention of the on-site compensation should be secured for 30 years post completion in order to comply with CP3, CP7 and TB23 and the NPPF.

Conditions & Reasons (if required)

Condition: Biodiversity enhancement - Prior to the occupation of the development, details of biodiversity enhancements, to include bird boxes, tiles or bricks on and around the new buildings and native and wildlife friendly landscaping, shall be submitted to and approved in writing by the council. The biodiversity enhancements shall thereafter be installed as approved.

Reason: To incorporate biodiversity in and around developments in accordance with paragraph 187 of the NPPF. Relevant policy: NPPF 2024 Section 15 and paragraph 198, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: Prior to the commencement of the development, full details of both hard and soft landscape proposals shall be submitted to and approved in writing by the local planning authority. These details shall include, as appropriate, proposed finished floor levels or contours, means of enclosure, car parking layouts, other vehicle and pedestrian access and circulation areas, hard surfacing materials and minor artefacts and structure (e.g. furniture, play equipment, refuse or other storage units, lighting, external services, etc). Soft landscaping details shall include planting plan, specification (including cultivation and other operations associated with plant and grass establishment), schedules of plants, noting species, planting sizes and proposed numbers/densities where appropriate, and implementation timetable.

All hard and soft landscape works shall be carried out in accordance with the approved details prior to the occupation of any part of the development or in accordance with a timetable approved in writing by the local planning authority. Any trees or plants which, within a period of ten years after planting, are removed, die or become seriously damaged or defective, shall be replaced in the next planting season with others of species, size and number as originally approved and permanently retained.

Reason To ensure no net loss of biodiversity habitat. Relevant policy: NPPF 2024 Section 15 and paragraph 198, Local Plan Core Strategy policies CP3 and CP7 and Managing Development Delivery policy TB23.

Condition: No retained tree shall be cut down, uprooted or destroyed, nor shall any retained tree be topped or lopped other than in accordance with the approved plans and particulars, without the written approval of the local planning authority. If within a period of thirty years from the date of the planting of any tree that tree, or any tree planted in replacement for it, is removed, uprooted or destroyed or dies, another tree of the same species and size as that originally planted shall be planted at the same place, unless the local planning authority gives its written consent to any variation.

Reason: To ensure no net loss of biodiversity. Relevant policy: NPPF 2024 Section 15 Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Condition: a) No development or other operation shall commence on site until an Arboricultural Method Statement and Scheme of Works which provides for the retention and protection of trees, shrubs and hedges growing on or adjacent to the site in accordance with BS5837: 2012 has been submitted to and approved in writing by the local planning authority. No development or other operations shall take place except in complete accordance with the details as so-approved (hereinafter referred to as the Approved Scheme).

b) No operations shall commence on site in connection with development hereby approved (including any tree felling, tree pruning, demolition works, soil moving, temporary access construction and or widening or any other operation involving use of motorised vehicles or construction machinery) until the tree protection works required by the Approved Scheme are in place on site.

c) No excavations for services, storage of materials or machinery, parking of vehicles, deposit or excavation of soil or rubble, lighting of fires or disposal of liquids shall take place within an area designated as being fenced off or otherwise protected in the Approved Scheme.

d) The fencing or other works which are part of the Approved Scheme shall not be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery and surplus materials removed from the site, unless the prior approval in writing of the local planning authority has first been sought and obtained.

Reason: To secure the protection throughout the time that the development is being carried out of trees shrubs or hedges growing within or adjacent to the site which are of biodiversity amenity value to the area, and to allow for verification by the local planning authority that the necessary measures are in place before development and other works commence Relevant policy: NPPF 2024 Section 15 Core Strategy policies CP3 and CP7 Managing Development Delivery Local Plan policy TB23.

Condition: At no time shall external lighting be installed on the site or affixed to any buildings on the site without the prior written approval of the local planning.

Reason To ensure that biodiversity, protected and priority species are not adversely affected by the proposals. Relevant policy: NPPF 2024 paragraph 198 and Section 15 (Conserving and Enhancing the Natural Environment), Core Strategy policies CP3 and CP7 and Managing Development Delivery Local Plan policy TB23.

Date:	06/07/26	Signed:	T Cuss
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