

PLANNING REF : 253028
PROPERTY ADDRESS : 3 Appleby Walk
: Reading, Berkshire
: RG7 1UZ
SUBMITTED BY : Dr R Lee
DATE SUBMITTED : 10/06/2026

COMMENTS:

Reason for Objection: Material Breach of Statutory Biodiversity Net Gain (BNG) Requirements, Inaccurate Baseline Data, Adverse Impact on Residential Amenity (Loss of Light/Overshadowing), and Unsustainable Site Layout.

I write to strongly object to the above planning application. While this is a commercial residential institution (Use Class C2), its extensive scale directly impacts neighbouring residential properties. I request that the Planning Committee and the LPA Ecology Officer review the following fundamental errors and material considerations.

1. Misclassification of Baseline Habitat and Potential Under-Recording of Baseline Units

In the submitted Biodiversity Net Gain Assessment (Document Ref: R853_BNG_a, Section 5.2.5), the author states:

"Evidence of four felled trees was observed... with an image provided by the client confirming that these were Leylandii (*Cupressocyparis leylandii*) (Photograph 8)... As such, these four felled trees have been mapped as an ornamental hedgerow."

This baseline classification is inaccurate and relies on a miscaptioned photograph (Photograph 8). Photographic evidence from the community demonstrates that this feature was not a non-native, low-value Leylandii ornamental hedge. It was a single, large, multi-stemmed mature native Yew tree (*Taxus baccata*) with minor ornamental shrubs nearby.

The report relies on a single, small photograph provided by the client (Photograph 8) to justify this classification. To assist the LPA

Ecology Officer in making a proper retrospective assessment of the baseline units, I have provided an alternative photograph taken from a different angle prior to the felling. This supplementary view clearly illustrates the distinct growth habit, foliage, and multi-stemmed structure of a mature native Yew tree rather than an ornamental Leylandii hedge:

<https://i.postimg.cc/ZYfm4sZg/Belamie-Gables-taxus-baccata.jpg>

Furthermore, the LPA Ecology Officer is respectfully directed to review the historical satellite imagery timeline on Google Earth for this site. Utilizing the historical date slider clearly reveals the presence of the, established multi-stem Yew tree canopy at this location prior to the recent clearance. This independent aerial data further corroborates that a substantial standalone native tree was removed on the western boundary to the site prior to the ecologist's baseline survey, rather than a non-native ornamental hedgerow.

The report admits that this clearance took place immediately prior to the ecologist's baseline assessment. Under Schedule 14 of the Environment Act 2021 (Anti-Degradation Rules), if a habitat is cleared before an assessment, the baseline must reflect the biodiversity value of the site before those activities took place.

The removal of a mature native tree between planning iterations cannot be used to artificially lower the environmental baseline. Its true, pre-felling value as a standalone native tree must be applied

retrospectively.

By passing off a high-value, mature native tree as a low-value ornamental hedge, the applicant's data significantly suppresses the true baseline biodiversity value of the site. I request that the LPA Ecology Officer reject this baseline and enforce a retrospective assessment designating this as a mature native tree of Medium Distinctiveness across both Area Habitat and Hedgerow modules.

2. Fatal Mathematical and Data Input Errors in the Statutory Metric
In Section 7.1.1 of the report (Biodiversity Metric calculation tool spreadsheet R853_BNG_a), there is a critical mathematical error regarding the 'On-site Hedgerow Units' calculation:

- On-site Baseline: 0.01 hedgerow units
- On-site Post-Intervention: 0.01 hedgerow units
- Reported On-site Net Change: +0.01 hedgerow units
- Reported Percentage Change: +79.21%

Mathematically, a shift from 0.01 units to 0.01 units represents a 0.00 net change (0% gain). The tool appears to have been overridden to generate a mathematically erroneous passing figure of 79.21%.

When the baseline is legally corrected to include the true value of the mature native Yew tree (Point 1) and this mathematical error is reconciled, the application will fail to meet the mandatory statutory 10% BNG target, resulting instead in a severe net biodiversity loss. The application cannot legally be granted with a non-compliant metric.

3. Impact on Amenity, Inappropriate Tree Species, and Water Main Infrastructure

The current Proposed Tree Plan indicates conifer planting along the northern boundary immediately adjacent to the fence line of the neighbouring properties to the north including my own. I strongly object to this element of the layout due to the severe loss of light and overshadowing it will cause to my property. The proposed tall-growing non-native conifers will act as a dense sun-block, destroying neighbouring lawns and garden ecosystems, heavily impacting our residential amenity.

Furthermore, this specific boundary layout encroaches onto an established buffer zone created during the original Taylor Wimpey Croft Gardens development. This zone sits directly over a strategic water main. Planting heavy-rooting, tall conifer species immediately over or adjacent to a water main poses a significant risk to utility infrastructure and restricts maintenance access.

The historical layout of this boundary must be respected to safeguard utility infrastructure and to mitigate previous unneighbourly action when the applicant cleared their boundary to this zone and discarded their wire mesh boundary fencing directly onto my property.

4. Operational Risk, Security, and DEPZ Capacity Context

While the previous appeal decision (Ref: APP/X0360/W/23/3326997) suggested that AWE Burghfield DEPZ emergency compliance could theoretically be managed via conditions and a business continuity plan, this relies entirely on the facility being fundamentally secure.

There was a past incident earlier this decade involving a vulnerable resident leaving the premises, which required significant emergency service intervention (including late-night police helicopter

deployment and searchlight sweeps) to locate the missing individual in the immediate vicinity - this was verbally confirmed at the time by discussing with the police about the reason for their search of my garden.

While the current application proposes a new front wall and access gates to enclose the front boundary, it remains vital that the security of the entire physical boundary is fully integrated. In my opinion, given past events, expanding the facility to 27 beds within the DEPZ requires careful scrutiny. An increased population of high-dependency residents makes the absolute security of the site perimeter a critical factor in the viability of their emergency evacuation plans. I request that the LPA Emergency Planning Team review whether the proposed boundary alterations, alongside existing fencing, are sufficient to manage these specific operational risks before an increased resident capacity is approved for this site.

5. Inaccuracies within the Community Involvement Statement

The submitted Community Involvement Statement asserts that the proposals do not "materially alter the external setting of the site or the relationship to adjacent neighbours" and claims that previous community feedback was "reviewed and considered as part of shaping the current application."

This appears to be incorrect. The current layout has been designed in isolation without local engagement, resulting in a scheme that directly compromises neighbouring residential amenity. As detailed in Points 1-4, the proposed layout fails to respect the historical layout buffer over strategic utility infrastructure and introduces aggressive, non-native boundary planting that will cause severe overshadowing. Far from resolving past concerns, the applicant's failure to engage with immediate neighbours, and to remove the distinctive yew tree, has resulted in a poorly considered boundary design that actively deteriorates the relationship with adjacent properties.

Requested Planning Conditions (Should Permission Be Granted)

If the LPA is minded to approve this application despite these failures, I request that the following strict pre-commencement planning conditions are attached to the decision notice:

1. Amended Landscaping and Metric Scheme: The planting plan along the northern boundary must be entirely redesigned. The proposed fast-growing, non-native conifers must be excluded from the scheme to prevent catastrophic loss of light to southern-aspect neighbouring gardens. They should be replaced with an appropriate mix of native species, including, for example, pleached fruit trees and a native hedgerow mix. This will genuinely contribute to local wildlife corridors, compensate for the loss of the original native Yew tree, and maintain a visually softer, light-permeable boundary. Furthermore, substituting conifer screening with native, and fruit-bearing species provides material benefits to the care home residents by creating a far more therapeutic, texturally varied, and seasonally engaging outlook.

2. Structural Infrastructure Setback: All proposed boundary planting along the northern line must be set back by a minimum of 0.5 metres from the property boundary. This layout condition is requested to safeguard the underlying strategic water main infrastructure and

ensure that the planting plan remains strictly within the applicant's site footprint without encroaching onto the infrastructure buffer zone put in as part of the Croft Gardens development.