



To Nick Woolley
10 Gun Street
Reading
Berkshire
RG1 2JR

Future Nature WTC Ltd
Meadow Farm
Thame Road
Blackthorn
Oxfordshire
OX25 1TW

07519 327486

adam.price@futurenaturewtc.uk

Dear Nick,

Re: Planning Application 230107 – 10 Gun Street, Reading

1. Introduction and Background

1.1. This report provides additional ecological information, following Environment Agency comments in respect of the above referenced planning application at 10 Gun Street, Reading.

1.2. The planning application was previously submitted for change of use and expansion to an existing entertainment venue at 9 Gun Street, Reading, including a detached 3-storey ancillary building to the rear boundary, over the culverted Holy Brook watercourse (Ref. 230107).

1.3 Ecological information submitted with the planning application included an ecology report¹ prepared by Future Nature WTC. This was informed by a preliminary ecological appraisal which was undertaken in August 2022. Due to the presence of several bat droppings and potential roost features at buildings within the site, bat emergence / re-entry survey work was also subsequently undertaken. The culvert was considered during this survey work, and observed during one of the emergence surveys.

1.4 Following the planning submission, an objection was subsequently received from the Environment Agency in June 2023, on the basis of there being insufficient information with respect to the Holy Brook watercourse, namely;

¹ Ecology Assessment. 10 Gun Street, Reading. Future Nature, November 2022.

- Potential adverse impacts as a result of the proposals; and
- Lack of a river condition assessment.

1.5 This report therefore provides additional ecological information in order to address these comments and overcome this objection.

2. Ecological Information

2.1. The author (Adam Price BSc (Hons), MSc) has undertaken a review of the existing ecological information. The author is accredited to undertake River Condition Assessment surveys in respect of Biodiversity Net Gain Assessments, and is experienced in completing other surveys applicable to freshwater habitats, including riparian mammal surveys and freshwater macro-invertebrate surveys.

2.2. The culvert is visible from where it opens immediately east of the site, though due to the urban setting of the culvert, it is not possible to access it fully. Nonetheless, full access would be unlikely to provide any additional information above that which has already been obtained (please also see 2.3 below).

2.3. Culverted sections of watercourse are considered to be a 'low distinctiveness' habitat within the latest Statutory Biodiversity Metric. Due to their being low distinctiveness habitat, culverts are able to be included within the Small Sites Statutory Biodiversity Metric (unlike a number of other watercourse habitats), which does not require habitat condition to be included. Accordingly, in both metrics, culverts do not require a river condition assessment to assess their condition within the metric^{2,3} and default to a 'Poor' condition within the main metric. This was also the case within the guidance for the previous version of the metric⁴.

2.4. The Holy Brook watercourse comprises an approximately 9.7km channel of the River Kennet, and rejoins the River Kennet in Reading town centre. For much of its length within Reading, the Holy Brook is culverted, running under the town within a heavily urbanised area. The Holy Brook is however occasionally open and visible.

² The Statutory Biodiversity Metric User Guide (draft), DEFRA. November 2023.

³ The Small Sites Metric (Statutory Biodiversity Metric) User Guide (draft), DEFRA. November 2023.

⁴ The Biodiversity Metric 4.0 User Guide, Defra Group. March 2023.

2.5. For the entirety of its length within the site (approximately 10m), the Holy Brook is culverted. The culvert is of brick construction. No aquatic or emergent vegetation is evident within the culvert, and no bats were observed to utilise the culvert during the emergence survey work. The Holy Brook is therefore only likely of ecological value in terms of species commuting through it, such as fish and freshwater invertebrates, with negligible sheltering and foraging opportunities afforded to them.

2.6. The potential for the presence of the protected species Atlantic salmon *Salmo salar* and European eel *Anguilla anguilla*, plus the River Kennet's designation as a Site of Special Scientific Interest (SSSI) were specifically mentioned in the objection raised by the EA. Atlantic salmon are highly unlikely to be present at the site, having not been reported within the River Kennet itself, with failed re-introduction attempts⁵ noted, and no records of this species from the Southcote Holy Brook angling site, located approximately 4km south west from the site. European eel are rarely reported within the River Kennet, and there is therefore some limited potential for this species to pass through the site, though this species is also not mentioned from local angling records. Furthermore, according to MAGIC mapping, the SSSI designation for the River Kennet is not applicable to the river near to the site, ending approximately 15.8km south west from site. In any case, in the event European eel do pass through the Holy Brook tributary to the River Kennet, it is considered that the proposals will not have an adverse impact on this or any other fish species, subject to the implementation of mitigation measures as outlined below. In addition, any de-culverting at the site would have a minimal benefit for these species, even should they be present or colonise in the future (please also see Section 4 below).

2.7. The section of site immediately above the culvert comprises a yard, including an area of hardstanding and stored materials, transitioning to rubble and bare ground closer to the existing structure within the northern part of the site. The gravel and bare ground in the yard has been colonised by scattered vegetation such as buddleia and hedge bindweed *Calystegia sepium*.

2.8. The open stretch of the Holy Brook immediately east of the site is approximately 47m in length and all located outside of the site ownership. The banks are comprised of vertical

⁵ [Fish - ARK River Kennet](#)

brick walls, whilst the banktops are comprised of small patio yards associated with residential premises and The Oracle shopping centre, aside from some introduced shrubs, such as buddleia *Buddleja davidii* and colonising vegetation such as bramble *Rubus fruticosus*. Both such species are also occasionally present growing up and at the base of the brick wall forming the banks.

2.9. The next closest open stretch of the Holy Brook is located approximately 198m south west from the site, at St Marys Grove, and is intermittently open aside from road bridges for approximately 216m before running under the major A329 road, beyond which the Holy Brook is consistently open. The culvert is also open before rejoining the River Kennet, approximately 364m north east from the site next to Reading Central Library. This open stretch is approximately 115m in length.

3. Mitigation

3.1. Due to the culverted nature of the Holy Brook within the site, the watercourse will remain protected from any direct impacts arising from any construction works occurring at the site. However a number of mitigation measures will be implemented, in order to ensure the watercourse is not adversely impacted by indirect impacts, in particular the offsite open section adjacent to site. These should be secured by planning condition on receipt of planning permission, such as through a Construction and Environmental Management Plan, and will include measures such as the following:

- Preventative measures in respect of dust and other emissions arising from construction entering the watercourse (i.e. plant and wheel washing to take place away from the watercourse);
- During construction, a drainage strategy will be included which intercepts any surface water runoff which may enter into the watercourse (i.e. discharge of contained water to go to foul sewer if permission can be granted from the local provider); and
- Chemicals and fuels to be stored in secure containers as far from the watercourse as is practicable and with suitable bunds and spill kits provided.

3.2. Subject to the implementation of such safeguards, it is considered that the Holy Brook and any fauna utilising it will remain protected during the construction works.

4. Enhancements

4.1. As has been described above, the Holy Brook within the site is entirely culverted and located within a heavily urbanised setting. Any enhancements to the site's section of the Holy Brook are therefore considered to be highly constrained.

4.2. Nonetheless, options for enhancing the Holy Brook have been considered, in line with local policy which was referred to in the Environment Agency's comment and states that *'Reading's waterspaces will be protected and enhanced....'* and that development should *'seek to increase the prominence of the Holy Brook, and open up the brook for public access, as well as consider any opportunities for de-culverting it, which will provide ecological and potentially flood risk benefits.'*⁶

4.3. De-culverting is specifically mentioned within the local policy referred to above. However, given the scale and nature of the proposals, de-culverting as part of the proposed re-development of the site is considered to be impractical and would be disproportionate to the proposals. The following rationale is set out in respect of not de-culverting.

4.4. Firstly, the part of the Holy Brook within the site boundary is only about 10m in length, therefore any de-culverting here would represent a small proportion of the Holy Brook, a large section of which is culverted within Reading town centre (i.e. approximately 636m of 950m or 67% is culverted) and would be of minimal ecological benefit.

4.5. Furthermore, the section which is de-culverted immediately east of the site is still located within a heavily urbanised area, with a concrete channel and the banks comprised of vertical brick walls. Therefore any potential for other enhancements at this section (which lies beyond the applicant's ownership in any case) is significantly constrained. If, for example, the Holy Brook comprised a natural channel in site, and natural banks were present, this would still only represent a very minimal area of habitat, surrounded by urban habitat on all sides, and therefore would offer few opportunities for wildlife.

4.6. As has been described above, there are other sections of the Holy Brook which are open within the town, the closest of which are located 198m south west and 364m north east from the site respectively. The culverted section of the Holy Brook which runs south west from the

⁶ Reading Borough Local Plan, Adopted November 2019. Policy EN11: Waterspaces

site, is located under commercial premises and numerous residential properties, and passes under a main road (Bridge Street), which makes this section highly unlikely to be a feasible location for a wider de-culverting strategy. Similarly, to the north east, the Holy Brook is culverted and passes under a major commercial centre, including parts of The Oracle shopping centre, a main road (Kings Road) and numerous commercial premises, and similarly this section is therefore highly unlikely to be suitable for a wider de-culverting strategy.

4.7. With regard to the site itself, part of the site extends over and beyond the Holy Brook to the south (currently comprising a hardstanding section of yard). This area is integral to the proposed redevelopment, including a refuse store, storage room and green room, with access to the extended building over the Holy Brook. By de-culverting the Holy Brook, the applicant would lose a significant proportion of the developable area within the site and be cut off from the southernmost part of the site.

4.8. Overall it is therefore considered that attempting to de-culvert this section of the Holy Brook would be disproportionate and not feasible in respect of the proposed redevelopment of the site, which seeks to use an existing derelict premises of minimal ecological value, and provides other ecological enhancements, including a green roof, new bat roosting provision and new bird boxes.

5. Conclusion

5.1. Opportunities for enhancing the Holy Brook watercourse within the site proposed for redevelopment at 10 Gun Street have been considered, with particular regard given to potential de-culverting.

5.2. Due to the heavily urbanised setting of this section of watercourse, its small extent (approximately 10m in length) and lack of realistic opportunities for de-culverting in nearby connected sections of the Holy Brook, it is considered that de-culverting the Holy Brook at the site would have a negligible effect on biodiversity and a disproportionate impact on the proposed redevelopment at the site and is therefore not feasible.

5.3. An outline of mitigation measures has also been set out, in order to ensure the Holy Brook remains safeguarded and its current ecological value maintained, during any proposed construction works and beyond, should planning permission be granted.

5.4. This report therefore sets out additional ecological information in order to overcome the objection raised by the Environment Agency in respect of the proposed redevelopment at the site.

I trust the above information is helpful, but please do not hesitate to contact me should you have any queries.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Adam Price', with a stylized, cursive script.

Adam Price

Consultant Ecologist

Future Nature WTC