

**816 Oxford Road
Reading
Berkshire
RG30 1EL**

Preliminary Ecological Appraisal

Ref: R2928/b

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1	EXECUTIVE SUMMARY	3
2	INTRODUCTION	4
2.1	Background.....	4
2.2	Site Location and Context	4
2.3	Objectives	4
3	PLANNING POLICY BACKGROUND	6
3.1	National Planning Policy.....	6
3.2	Local Planning Policy	6
4	LEGISLATIVE BACKGROUND.....	8
4.1	Overview.....	8
4.2	European Protected Species Mitigation Licensing	8
5	SURVEY METHODOLOGY	10
5.1	Phase 1 Habitat Survey.....	10
5.2	Building Inspection	10
5.3	Background Ecological Data Search	11
5.4	Survey Constraints	11
6	BACKGROUND DATA SEARCH FINDINGS	12
6.1	Habitats and Site Designations	12
6.2	Protected and Notable Species	12
7	PHASE 1 HABITAT SURVEY FINDINGS.....	14
7.1	Site Overview.....	14
7.2	Other habitat (OH1 & TN1).....	14
7.3	Short ephemeral vegetation (ESP1)	14
7.4	Buildings (B1-3).....	15
8	PRELIMINARY BAT ROOST ASSESSMENT FINDINGS	16
8.1	Introduction	16
8.2	Showroom and warehouse (B1)	16
8.3	Office (B2).....	17
8.4	Warehouses (B3)	17
9	DISCUSSION	19
9.1	Assessment of Ecological Value.....	19
9.2	Impact of Proposals	20
10	RECOMMENDATIONS	22
10.1	Bats	22
10.2	Ecological Enhancements	22
11	REFERENCES	23
	APPENDIX 1 - LEGISLATIVE BACKGROUND – PROTECTED SPECIES	24
	APPENDIX 2 - SITE PHOTOGRAPHS.....	29
	APPENDIX 3 – PHASE 1 HABITAT SURVEY PLAN AND TARGET NOTES.....	35
	APPENDIX 4 - PLANT SPECIES RECORDED DURING THE SURVEY	37
	APPENDIX 5 – BUILDING INSPECTION FINDINGS.....	38
	APPENDIX 6 – PROPOSED PLANS	39

1 EXECUTIVE SUMMARY

- 1.1.1** John Wenman Ecological Consultancy LLP was commissioned by John Filbee Properties Limited to undertake a preliminary ecological appraisal of the land and buildings at 816 Oxford Road in Reading, Berkshire. The survey was commissioned in connection with a planning application seeking consent for the development of the site for residential flats, following the demolition of the existing buildings.
- 1.1.2** A walkover survey of the site was completed on 14th September 2021 and showed the site to comprise of light industrial buildings in various stages of disrepair and areas of hard standing. There were small patches of ephemeral vegetation and a tree immediately beyond the site boundary of some ecological value within the site but of no conservation importance in a wider context. A search of data held by the Thames Valley environmental Record Centre (TVEC) shows the survey site is not designated statutorily for its conservation interest and that there are no pre-existing records of protected or notable species held for the site.
- 1.1.3** The majority of the site comprised of hard standing with occasional patches of ephemeral vegetation i.e. areas of negligible-low ecological value and as such the proposals will not habitats or conservation importance or have any impact on designated wildlife sites.
- 1.1.4** No evidence of roosting bats was found during the preliminary bat roost assessment of the buildings, which had external features of limited extent in an urban setting and therefore of negligible bat roost. As such, demolition is highly unlikely to affect bats or their roosts.
- 1.1.5** The proposals present opportunities for ecological enhancements such as: the provision of bird and bat boxes on the new buildings, use of native plant species of local provenance within landscaping and provision of features such as rockeries and log piles to provide cover and habitat for small mammals and invertebrates.

2 INTRODUCTION

2.1 Background

2.1.1 John Wenman Ecological Consultancy LLP was commissioned by John Filbee Properties Limited to undertake a preliminary ecological appraisal of the land and buildings at 816 Oxford Road in Reading, Berkshire.

2.1.2 The survey was commissioned in connection with an application to be lodged with Reading Borough Council seeking consent for demolition of existing building and the erection of two new residential blocks to provide new residential flats.

2.2 Site Location and Context

2.2.1 The survey site is situated on the northern side of Oxford Road in Reading, Berkshire (OS grid reference: SU 68801 74090).

2.2.2 The site is currently an unused plot, comprising of a collection of light industrial buildings, in various states of decay. The site is bordered by residential buildings to the west and north, with light industrial units to the east. The River Thames flows approximately 560 metres to the north of the site, with areas of grassland and scattered trees to the north and south of the river. There are more areas of open grassland present to the north-east of the site, with an area of traditional orchard - a Priority Habitat Inventory (PHI) - situated approximately 805 metres away.

2.2.3 The urban habitats nearby are suitable for use by a range of fauna adapted to urban areas, with habitats in the wider area forming part of important foraging and commuting corridors for birds and bats.

2.3 Objectives

2.3.1 The aim of this preliminary ecological appraisal is to understand the nature of the site and assess its current ecological value. The key objectives are:

- to identify any likely ecological constraints associated with the planning proposals;
- establish appropriate mitigation measures in accordance with the mitigation hierarchy (i.e., avoidance > mitigation > compensation);
- determine any additional surveys following on from this preliminary stage; and

- recognise opportunities for biodiversity enhancement in line with national and local planning policy (i.e. achieving biodiversity net gain).

3 PLANNING POLICY BACKGROUND

3.1 National Planning Policy

- 3.1.1** The ODPM Circular 06/2005 provides guidance on the application of the law relating to planning and nature conservation stating that *'the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat.'*
- 3.1.2** The Natural Environment and Rural Communities (NERC) Act 2006 requires all public bodies, including local authorities, to have regard to biodiversity conservation when carrying out their functions. This is commonly referred to as the 'Biodiversity Duty'
- 3.1.3** The National Planning Policy Framework (NPPF) published in March 2012 sets out the Government's planning policies for England and how they should be applied. Paragraph 117 of the NPPF states that *'To minimise impacts on biodiversity and geo-diversity, planning policies should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan.'*

3.2 Local Planning Policy

- 3.2.1** Planning policy within Reading Borough is defined by the policies within the Local Plan (adopted Nov 2019). The policy relevant to biodiversity and natural environment is as follows:

EN12: BIODIVERSITY AND THE GREEN NETWORK

- a) *The identified Green Network, the key elements of which are shown on the Proposals Map, shall be maintained, protected, consolidated, extended and enhanced. Permission will not be granted for development that negatively affects the sites with identified interest or fragments the overall network. The Green Network comprises:*
- *Sites with identified biodiversity interest - Local Wildlife Sites, Local Nature Reserves, Biodiversity Opportunity Areas, protected and priority species and their habitats, Priority and Biodiversity Action Plan habitats, and the River Thames and all its tributaries (including the River Kennet and the Kennet & Avon Canal); and*

- *Areas with potential for biodiversity value and which stitch the Green Network together – designated Local Green Space and open green spaces, and existing and potential Green Links.*

New development shall demonstrate how the location and type of green space, landscaping and water features provided within a scheme have been arranged such that they maintain or link into the existing Green Network and contribute to its consolidation. Such features should be designed to maximise the opportunities for enhancing this network. All new development should maximise opportunities to create new assets and links into areas where opportunities are as yet unidentified on the Proposals Map.

b) 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.*

3.2.2 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.

4 LEGISLATIVE BACKGROUND

4.1 Overview

4.1.1 The following pieces of legislation are considered relevant for the purpose of this preliminary ecological appraisal:

- Wildlife and Countryside Act (W&CA) 1981 (as amended)
- Conservation of Habitats and Species Regulations ('Habitat Regulations') 2017 (as amended)
- Countryside and Rights of Way (CRoW) Act 2000
- Natural Environment and Rural Communities (NERC) Act 2006
- Protection of Badgers Act 1992
- Wild Mammals (Protection) Act 1996

4.1.2 These acts hold relevance to both protected and invasive species and the degree of protection varies depending on faunal/floral group or species. For example, some species of European level conservation importance (e.g., bats) receive full protection with the UK under the Habitat Regulations whereas others may only be afforded protection through national legislation such as the W&CA 1981 (e.g., common lizard). For a detailed overview of species-specific legislation, please refer to Appendix 1.

4.2 European Protected Species Mitigation Licensing

4.2.1 The government's statutory conservation advisory organisation, Natural England, is responsible for issuing European Protected Species Mitigation Licences (EPSML), which permit activities that would otherwise lead to an infringement of the Habitat Regulations 2019. An EPSML can be issued if the following three tests have been met:

- Regulation 55(9)(a) - there is "no satisfactory alternative" to the derogation;
- Regulation 55(9)(b) - the derogation "will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range"; and
- Regulation 55(2)(e) - the derogation is for the purposes of "preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment"

4.2.2 Local Planning Authorities (LPAs) have a statutory duty under Regulation 7(3e) of the Habitat Regulations 2019 to regard requirements of the Habitats Directive in the exercise of their functions. Consequently, the LPA must consider and determine whether these three tests are likely to be satisfied by an application affecting European protected species before granting planning permission.

5 SURVEY METHODOLOGY

5.1 Phase 1 Habitat Survey

5.1.1 An ecological walkover survey was undertaken on the 14th September 2021 by an associate member of the Chartered Institute of Ecology and Environmental Management (CIEEM) and an assistant ecologist. During the survey the habitats present were noted and plotted on a site plan (**Appendix 3**) using definitions based on the standard phase 1 ecological survey definitions (JNCC 2010). Key features of the site were photographed (**Appendix 2**) and plotted on the site plan using target notes (**Appendix 3**).

5.1.2 Any features of ecological importance were recorded, and plant species observed during the survey noted (**Appendix 4**). Particular attention was given to any evidence of the presence of protected species and the site's potential to support such species and those of principal importance for conservation (SPI) as defined under Section 41 of the NERC Act 2006.

5.2 Building Inspection

5.2.1 An external and internal inspection of the buildings on site looking for evidence of roosting bats and nesting birds was undertaken by an ecologist registered under Natural England Class License CL17 and an assistant ecologist on the 14th September 2021.

5.2.2 The search was undertaken with the aid of binoculars and a high power (1 million candle power) torch. Signs of occupation by bats and features that could offer potential roosting sites following standard survey guidelines were looked for (Collins 2016; Mitchell-Jones 2004; Mitchell-Jones & McLeish 2004).

5.2.3 The following may indicate the presence of a bat roost within a building:

- Bat droppings (these can be found externally, especially in sheltered areas such as window sills, underneath roost entrances or internally within a roof space);
- Piles of insect remains e.g. moth wings (these are indicative of regular feeding sites used by species such as brown long eared bat);
- Staining at roost entrances or within the roost (urine and oil from fur can leave stains on timbers when bats are gathered for long periods); and

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- Bats (live or dead).

5.2.4 Buildings may offer potential roosting sites for bats, with favoured locations include:

- Under tiles, especially when loose or lifted tiles are present, or sections of mortar are missing;
- Under sections of raised lead flashing;
- Gaps in stonework;
- At the eaves – gaining access via gaps between the rafters and wall;
- Within an enclosed roof space – long-eared bats (*Plecotus* spp.) for example, will often cluster at the ridge beam.

5.2.5 The buildings were inspected also for evidence of nesting birds and this comprised a search for nesting material, feathers, droppings, birds (dead and alive) and listening for the calls of young birds occupying nests.

5.3 Background Ecological Data Search

5.3.1 The Thames Valley Environmental Records Centre (TVERC) was commissioned to undertake a search for any pre-existing records of notable or protected species and statutorily or non-statutorily designated sites held by them for the site and land within a 1 kilometre radius.

5.3.2 The Multi-Agency Geographic Information for the Countryside (MAGIC) website was referred to for statutorily designated areas of international and national importance within the wider area, and for habitats of principal importance for conservation (HPI) as defined under the NERC Act 2006.

5.4 Survey Constraints

5.4.1 The ecological survey was subject to seasonal constraints; not all plant and animal species are visible throughout the year and therefore the report represents a snapshot of the site at the time of the survey only. The plant species list presented should not be considered a comprehensive list of species present.

5.4.2 Full access was available to the internal and external of the buildings on site, and thus there were no constraints to the survey.

6 BACKGROUND DATA SEARCH FINDINGS

6.1 Habitats and Site Designations

- 6.1.1** The data held by Thames Valley Environmental Records Centre (TVERC) revealed no records of notable or protected species for the site and showed that the site is not statutorily or non-statutorily designated for its wildlife conservation interest.
- 6.1.2** There are not any nationally or internationally important sites within a 4km radius of the site. The closest statutorily designated site of local conservation importance is Round Copse LNR - a Local Nature reserve (LNR) - which is situated approximately 738 metres to the west of the survey site. The LNR comprises an area of 1.6 hectares, which includes dense woodland with a variety of birdlife. Lousehill Copse – approximately 912 metres to the south-west of the site – is another LNR, covering 13 hectares and including semi-ancient woodland, with oak and hazel coppices present, with streams and boggy areas.
- 6.1.3** There are two non-statutorily designated Local Wildlife Sites (LWS) - designated for their conservation importance within Berkshire - within the search area: McIlroy Park, a large grassland field surrounded by mixed deciduous and ancient woodland, approximately 850 metres to the west of the site, and Lousehill Copse, consisting of three parcels of semi-natural broadleaved woodland with areas of wet woodland also present, approximately 900 metres to the southwest of the site.

6.2 Protected and Notable Species

- 6.2.1** The Record Centre's database holds no records of protected or notable species specifically for the survey site; however, there are records for a range of protected and notable species within the 1 km search radius.
- 6.2.2** There are records of three amphibian species within the 1 km search area, including; historic records (more than 10 years old) of common frog (*Rana temporaria*) approximately 500 metres to the west of the site and contemporary records (within the last 10 years) of smooth newt (*Lissotriton vulgaris*) and palmate newt (*Lissotriton helveticus*), both approximately 930 metres to the south of the site, in 2018. Slow-worm (*Anguis fragilis*) is the only reptile species recorded within the 1 kilometre search radius, with multiple records dating from 2019, approximately 845 metres to the south-west of the site.

- 6.2.3** There are several bird records within the search radius including red kite (*Milvus milvus*) – listed under schedule 1 of the Birds Directive, and song thrush (*Turdus philomelos*) – a species listed as red on the IUCN Red List. Other notable species include; mallard (*Anas platyrhynchos*), stock dove (*Columba oenas*) and swift (*Apus apus*).
- 6.2.4** There are records of five bat species within a 1 km radius of the survey site including; common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*), brown long-eared (*Plecotus auritus*), Daubenton's bat (*Myotis daubentonii*) and noctule (*Nyctalus noctula*). Common pipistrelle (*Pipistrellus pipistrellus*) has been recorded around a site along Oxford Road, approximately 260 metres to the south-east of the site in 2016. A brown long-eared (*Plecotus auritus*) roost was recorded roosting approximately 760 metres to the south of the site, within a house along Water Road, Reading in 2017. An EPS licence was granted just over 1 kilometre to the south-west of the site in 2011 (EPSM2011-3384) for the destruction of a resting site for common pipistrelle (*Pipistrellus pipistrellus*) bats.
- 6.2.5** Other mammal species recorded within the search radius include the West European Hedgehog (*Erinaceus europaeus*), which has been recorded 760 metres to the south-west of the site, in 2019. A badger (*Meles meles*) sett was recorded in 2018, within Lousehill Copse LWS, approximately 915 metres to the south of the site, with an individual recorded approximately 750 metres to the west of the site in 2016.
- 6.2.6** There are multiple records of stag beetles (*Lucanus cervus*) within 1 kilometre of the site, the most recent being from 2018, 500 metres to the south-west of the site.
- 6.2.7** Higher flowering plant species recorded within the search radius include bluebell (*Hyacinthoides non-scripta*) – a species which is listed under Schedule 8 of the Wildlife & Countryside Act 1981. Other notable species include cat mint (*Nepeta cataria*) and corn marigold (*Glebionis segetum*) – listed as vulnerable on the IUCN red list - and wild strawberry (*Fragaria vesca*), tormentil (*Potentilla erecta*), marsh ragwort (*Senecio aquaticus*), corn mint (*Mentha arvensis*) and common valerian (*Valeriana officinalis*) - listed as near-threatened species on the IUCN Red List.

7 PHASE 1 HABITAT SURVEY FINDINGS

7.1 Site Overview

- 7.1.1** The survey site covered approximately 0.2 hectares comprising of two buildings including the store and offices (**B1**) and warehouses (**B2**).
- 7.1.2** The buildings were surrounded by areas of hard standing to the south and east of the site. There were an area of short ephemeral growing along the eastern boundary and there were scattered trees on the northern boundary of the site.
- 7.1.3** The following Phase 1 habitat types were observed within the site boundary during the survey: short ephemeral vegetation, buildings and hard standing (other habitat). The habitat types are described below in detail; photographs of the site are shown in **Appendix 1** and their distribution is shown on the site plan in **Appendix 2**.

7.2 Other habitat (OH1 & TN1)

- 7.2.1** The majority of the site comprised of hard-standing with areas of concrete and asphalt, with occasional bramble (*Rubus fruticosus* agg.), dandelion (*Taraxacum officinale*), buddleja (*Buddleja* spp.), ragwort (*Jacobaea vulgaris*) and herb-Robert (*Geranium robertianum*) (**Photograph 3; OH1**). Immediately beyond the northern boundary was a willow tree (*Salix* spp.), which had branches hanging over the brick wall (**Photograph 4; TN1**).

7.3 Short ephemeral vegetation (ESP1)

- 7.3.1** There was an area of short ephemeral vegetation growing up through the concrete and along the fence line in places towards the north-east of the site, along the eastern side of the showroom (B1) and below the willow tree on the northern boundary (**Photographs 1 & 2; ESP1**). Species present included: black medic (*Medicago lupulina*), horseweed (*Erigeron canadensis*), dandelion (*Taraxacum officinale*), buddleia species (*Buddleja davidii*), perennial ryegrass (*Lolium perenne*), fescue species (*Festuca* sp.), common bent (*Agrostis capillaris*), perforated St.Johns-wort (*Hypericum perforatum*), red clover (*Trifolium pratense*), ribwort plantain (*Plantago lanceolata*), yarrow (*Achillea millefolium*), nettle (*Urtica dioica*), rosebay (*Chamaenerion angustifolium*), elder (*Sambucus nigra*), hawksbeard (*Crepis* sp.), Yorkshire fog (*Holcus lanatus*), knotgrass (*Polygonum aviculare*), great mullein (*Verbascum thapsus*) and herb-Robert (*Geranium*

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robertianum).

7.4 Buildings (B1-3)

- 7.4.1** The site had three buildings consisting of a showroom (**B1; Photograph 5**) and an office building (**B2; Photograph 6**) to the front (south) of the site, and a double pitched roof warehouse (**B3; Photograph 7**) along the north- western side of the site.

8 PRELIMINARY BAT ROOST ASSESSMENT FINDINGS

8.1 Introduction

8.1.1 Photographs of the buildings (labelled B1–3) are presented in **Appendix 1** and their location is illustrated on the survey plan in **Appendix 2** and the findings are shown on a plan in **Appendix 3**. The survey findings from the exterior and interior of the buildings are described as follows:

8.2 Showroom and warehouse (B1)

External Survey

8.2.1 The building was constructed out of blockwork and had a double pitched roof above the warehouse, with a flat roof section on the eastern and northern side of the showroom (**Photograph 8**). There were large glass windows on the southern and part of the eastern elevation, with two windows boarded up (**Photograph 9; Target note 1**). There was metal paneling along the top of the building, which was tight to the blockwork on the flat roof sections of the building (**Photograph 10; Target notes 2 & 3**). A slight gap was visible behind the metal fascia and the blockwork at the eastern gable end of the building (**Photograph 11; Target note 4**). There was a double door with shutters present on the rear of the building, which were tight to the frame (**Photograph 12; Target note 5**).

Internal Survey

8.2.2 The interior of the building had fully rendered walls and the ceiling was open to the roof at southern side of the building, with the metal trusses and underneath of metal corrugated sheeting visible (**Photograph 13; Target note 6**). There was a brick gable at the eastern end of the building, which was tight to the rafters (**Photograph 14; Target note 7**). The brick gable at the western end had gaps between the roof and the brickwork, with other gaps behind the timber beam and the wall (**Photograph 15; Target note 8**).

8.2.3 The centre of the building featured a partial false ceiling made up of ceiling tiles, which were occasionally missing (**Target note 9**). The flat roof to the eastern side of the building had a false ceiling, with damp and water damage visible and the underside of asbestos roofing visible above an air conditioning unit (**Photographs**

16 & 17; Target note 10). The ceiling was open to the roof at the northern side of the building, with the trussed wooden rafters and corrugated metal sheeting visible (**Photograph 18; Target note 11).**

- 8.2.4** No evidence of bats was found during the external or internal survey of the showroom and warehouse.

8.3 Office (B2)

External Survey

- 8.3.1** The two-storey office was attached to the store building on the eastern elevation. The building was of brick construction with a flat roof covered in bitumen roofing felt (**Photograph 19; Target note 12).** There was a slight gap behind the barge board on the western elevation, which was unsuitable for bats (**Photograph 20; Target note 13).** There was a covered yard to the west of the offices, with a corrugated metal shed roof (**Photographs 21 & 22; Target note 14).**

Internal Survey

- 8.3.2** There was no loft space to survey in the office, and the rooms were fully plastered, with some water damage visible on some of the walls and ceiling (**Photograph 23).** No evidence of bats was found internally or externally in the office.

8.4 Warehouses (B3)

External Survey

- 8.4.1** The warehouses to the north-western side of the site were of blockwork construction with a corrugated asbestos double pitched roof (**Photograph 24; Target note 15).** A double door with metal shutters and a metal roller door were present on the eastern elevation of the building, which was tight to the frame (**Target note 16).** There was a gap of limited extent at the top of the blockwork wall, blocked behind the gutter on the eastern elevation (**Photograph 25; Target note 17).** There was a cobwebbed gap behind the asbestos barge board at the northern gable of the building (**Photograph 26; Target note 18).** The northern elevation of the building featured extensive ivy growth over the wall and part of the roof (**Photograph 27; Target note 19).**

Internal Survey

- 8.4.2** The warehouse had concrete floor throughout and were open to the roof, with the metal rafters and underside of the asbestos sheet roof visible (**Photographs 28 & 29; Target note 20**). The blockwork walls were rendered and tight to the roof rafters, with daylight visible above the roller metal door (**Photograph 30; Target note 21**). Some ivy was seen growing over the wall plate at the north-eastern elevation of the building (**Photograph 31; Target note 22**). There were scattered rat droppings throughout the building, with two dead rats also seen on the floor (**Target note 23**).
- 8.4.3** No evidence of bats was found internally or externally in the warehouse.

9 DISCUSSION

9.1 Assessment of Ecological Value

Habitats

9.1.1 The survey site comprised of hard standing, short ephemeral vegetation and buildings, with a scattered tree on the northern boundary of the site. During a search of pre-existing data, the site has been shown not to be statutorily or non-statutorily designated for its wildlife interest and therefore not recognised as being of international, national or county level conservation importance.

9.1.2 The urban habitats largely comprising buildings and hard standing are of negligible ecological value. The short ephemeral plants within the hard standing offered habitat of some limited ecological value at the site level. The scattered tree which was surrounded by hard standing offered habitat for nesting birds and as such are of negligible ecological value at the site level.

Bats

9.1.3 The hedgerows on the boundary offered commuting and foraging habitat for bats, however, they were relatively isolated within an urban setting. The trees on site are considered important locally as part of a commuting corridor but at a site level the trees were immature and semi-mature and lacked any visible roosting features for bats (e.g. woodpecker holes, rot holes, lifted bark).

9.1.4 The buildings on site comprised of; a showroom (**B1**), offices (**B2**) and a warehouse (**B3**). The buildings were of blockwork and brickwork construction with corrugated asbestos and metal sheet roofs and mostly lacked any features suitable for bats. There were occasional gaps behind barge boards on the office and warehouse buildings, with cobwebbed gaps at the apex of two gable ends. The location of the gaps were poor for bats, as they were within a built-up setting, and they were of limited extent and showed no evidence of use by bats, and thus the buildings were considered highly unlikely to support roosting bats and considered to be of negligible bat roost potential.

Hazel Dormice

9.1.5 There is no suitable habitat on site for commuting, foraging or nesting dormice.

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Hazel dormice favour dense habitat connected to woodland that allows animals to move easily through habitats without coming to the ground (English Nature 2006). Furthermore, there are no known records within the local area and this species is not considered further.

Amphibians

- 9.1.6** The habitat on the site did not provide sheltering or foraging habitats for amphibians, furthermore they were isolated by surrounding hard standing and buildings in the immediate vicinity with urbanisation on all sides. There are no records for the great crested newt (*Triturus cristatus*) – a European Protected Species - within the 1 km search area and as such it is highly unlikely that great crested newt or other amphibian species make use of the site, and these species are not considered further.

Reptiles

- 9.1.7** There is a lack of suitable reptile habitat on site, which is isolated from suitable habitat in the wider area. Furthermore, there are no recent records for grass snake (*Natrix helvetica*) and adder (*Vipera berus*) within 1 km of the site, and as such, it is highly unlikely the site supports reptiles, and these species are not considered further.

Badgers

- 9.1.8** No badger (*Meles meles*) sett entrances or signs of badger activity e.g. diggings were noted during the site walkover, with no records of badgers within the 1 kilometre search radius and this species is not considered further.

Nesting Birds

- 9.1.9** The tree immediately beyond the site boundary of the site provides some nesting and foraging opportunities for common and widespread bird species typical of garden habitats just off site, which may include some notable species of conservation importance.

9.2 Impact of Proposals

- 9.2.1** The proposals are for the re-development of the site including two blocks of residential dwellings with parking and landscaping, following the demolition of the

existing buildings.

Designated Sites

- 9.2.2** There are no statutorily designated sites (i.e. SSSIs) or internationally designated wildlife sites (i.e., SPA and SACs) within 4km of the site and as such the redevelopment of the site will have no impact on these sites. The locally important sites are more than 700m from the urban site and therefore would be unaffected by the site's redevelopment.

Habitats

- 9.2.3** The proposed development encompasses the entirety of the site, including the footprint of the existing buildings and areas of hard standing and short ephemeral vegetation i.e. habitats of negligible conservation importance.
- 9.2.4** There are opportunities for the habitats on site to be ecologically improved as part of the development (refer to recommendations in **Section 10**).

Bats

- 9.2.5** The demolition of the existing buildings is highly unlikely to have an impact on bats or their roosts and therefore the removal of these buildings would not require a European Protected Species mitigation licence to proceed lawfully.
- 9.2.6** It is unlikely the site is used by foraging bats, but if present, the proposals will not have an adverse impact on the availability of foraging habitat for bats as the tree to the rear of the site boundary will be retained and unaffected by the works. If artificial lighting is installed on site, there is a low risk that if bats are present that foraging routes could be illuminated which would cause disturbance to bats and lead to the loss of foraging habitat (Stone et. al. 2015a; Fure 2006); however, if simple avoidance and a suitable lighting strategy employed, any low risk of impacts could be avoided (refer to recommendations in **Section 10**).

10 RECOMMENDATIONS

10.1 Bats

10.1.1 In the long-term, dark corridors should be retained on site along the northern boundary thereby maintaining foraging and commuting corridors for bats across the site. Exterior lighting on the new buildings should be avoided, particularly on the northern end of the site, but where essential, lighting should make use of low UV lamps e.g. warm white LED lamps, and be controlled using passive infrared sensors so that lighting operates only when necessary.

10.2 Ecological Enhancements

10.2.1 The development proposals would provide opportunities for the enhancement of the site's biodiversity value in order to achieve a net gain. The inclusion of the following recommendations would be of ecological benefit and be in line with the National Planning Policy Framework (NPPF) and local planning policies:

- The provision of house sparrow or starling nest boxes at the eaves of the new buildings.
- The provision of integral bat boxes sited at the eaves in the new buildings on site.
- A landscaping strategy designed to increase the structural and species diversity of the site by making use of native plant species of local provenance including trees, shrubs and areas of grassland.
- Provision of features within landscaped areas that provide foraging opportunities and cover for small mammals such as rockeries and partially buried log piles for invertebrates such as the stag beetle which has been recorded locally.

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APPENDIX 1 - LEGISLATIVE BACKGROUND – PROTECTED SPECIES

Amphibians

The seven native species of amphibian receive protection under the Wildlife & Countryside Act 1981 (as amended). The four widespread and common amphibians (common frog, toad, smooth and palmate newts) receive limited protection – making their sale illegal.

Great crested newts receives full protection under the Wildlife & Countryside Act 1981 (as amended) and under the Conservation (Natural Habitats &c.) Regulations 2017 ('Habitat Regulations') (as amended). These make it illegal to:

- Intentionally or recklessly kill, injure or take a great crested newt;
- Possess or control any live or dead specimen or anything derived from a great crested newt;
- Intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection by a great crested newt;
- Intentionally or recklessly disturb great crested newts; in particular any disturbance which is likely to impair their ability to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating animals, to hibernate or migrate.

The great crested newt is listed as being of principal importance for the conservation of biodiversity in England, under Section 41 of the Natural Environment and Rural Communities Act 2006, (commonly referred to as a UK Priority Species).

Reptiles

The four widespread reptiles most likely to be encountered (Adder, grass snake, slow worm and viviparous lizard) are protected under the Wildlife & Countryside Act 1981 (as amended). The Act makes it an offence to intentionally kill, injure, possess or sell any of the species.

The four reptile species are listed as being of principal importance for the conservation of biodiversity in England, under Section 41 of the Natural Environment and Rural Communities Act 2006, (commonly referred to as a UK Priority Species).

Birds

All wild birds are protected under the Wildlife & Countryside Act 1981 (as amended). The Act makes it an offence to kill, injure or take a wild bird or to damage or destroy the nest of a

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wild bird whilst in use or being built.

Less common bird species of conservation concern, such as the barn owl and kingfisher, are listed on Schedule 1 of the Act, which makes it an offence to disturb the birds whilst nesting also.

Bats

All British bat species are fully protected by the Wildlife & Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 ('Habitat Regulations'). In summary, the legislation combined makes it an offence to:

- Damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a bat;
- Deliberately, intentionally or recklessly disturb bats; in particular any disturbance which is likely to impair the ability of bats to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating bats, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species;
- Deliberately kill, injure or take any bat.

Badgers

Badgers are protected by the Protection of Badgers Act 1992. The Act makes activities such as development that would harm or disturb badgers or damage, obstruct or destroy their setts illegal. If badgers are to be affected by the proposed development, activities can be undertaken only under a licence issued by Natural England.

Otters

Otters are fully protected by the Wildlife & Countryside Act 1981 (as amended) and by the Conservation of Habitats and Species Regulations 2017 ('Habitat Regulations') (as amended). In summary, the legislation combined makes it an offence to:

- Damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by an otter;
- Deliberately, intentionally or recklessly disturb otters; in particular any disturbance which is likely to impair the ability of otters to survive, breed or reproduce or nurture their young; or to affect significantly the local distribution or abundance of the species;
- Deliberately kill, injure or take any otter.

Hazel Dormice

Dormice receive full protection under the Wildlife & Countryside Act 1981 (as amended) and under the Conservation (Natural Habitats &c.) Regulations 2017 ('Habitat Regulations') (as amended). These make it illegal to

- Intentionally or recklessly kill, injure or take a dormouse;
- Possess or control any live or dead specimen or anything derived from a dormouse;
- Damage or destroy a breeding site or resting place or intentionally or recklessly obstruct access to a structure or place used for shelter by a dormouse;
- Intentionally or recklessly disturb dormice; in particular any disturbance which is likely to impair their ability to survive, breed or reproduce or nurture their young; or in the case of hibernating or migrating animals, to hibernate or migrate.

The government's statutory conservation advisory organisation, Natural England, is responsible for issuing European Protected Species licences that would permit activities that would otherwise lead to an infringement of the Habitat Regulations. A licence can be issued if the following three tests have been met:

- **Regulation 53(9)(a)** - there is “no satisfactory alternative” to the derogation, and;
- **Regulation 53(9)(b)** - the derogation “will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range” and;
- **Regulation 53(2)(e)** - the derogation is for the purposes of “preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment”.

Local authorities have a statutory duty under Regulation 7(3) of the Habitat Regulations to have regard to requirements of the Habitats Directive in the exercise of their functions. The Council must therefore consider and determine whether these three tests are likely to be satisfied by an application affecting European protected species before granting planning permission. **N.B. the requirements set out in 3.7.2 and 3.7.3 apply to development that would affect bats, great crested newts and otters, which are European Protected Species also.**

Water Voles

Since April 2008, water voles have received full protection under Section 9 of the Wildlife & Countryside Act 1981 (as amended). This makes it an offence to intentionally kill, injure or take water voles or to possess or control live or dead water voles or derivatives. It is an offence to intentionally or recklessly damage, destroy or obstruct access to any structure or place used for shelter or protection or intentionally or recklessly disturb water voles whilst occupying a structure or place used for that purpose.

The water vole is listed as being of principal importance for the conservation of biodiversity in England, under Section 41 of the Natural Environment and Rural Communities Act 2006, (commonly referred to as a UK Priority Species).

Invasive Non-Native Plants

The Wildlife and Countryside Act 1981 (as amended) provides the primary controls on the release of non-native species into the wild in Great Britain. It is an offence under section 14(2) of the Act to ‘plant or otherwise cause to grow in the wild’ any plant listed in Schedule 9, Part II. The species listed in the Act includes Japanese knotweed (*Fallopia japonica*),

giant hogweed (*Heracleum mantegazzianum*) and himalayan balsam (*Impatiens glandulifera*).

Injurious Weeds

Five native plants are listed as injurious weeds under the Weeds Act 1959: common ragwort (*Senecio jacobaea*), spear thistle (*Cirsium vulgare*), creeping or field thistle (*Cirsium arvense*), broad-leaved dock (*Rumex obtusifolius*) and curled dock (*Rumex crispus*). The Act means it is not an offence to have these weeds growing on your land and species such as ragwort have significant conservation benefits. However they must not be allowed to spread to agricultural land, particularly grazing areas or land which is used to produce conserved forage. Enforcement notices can be issued following complaints requiring landowners to take action to prevent the spread of these weeds.

Wild Mammals

Under the Wild Mammals (Protection) Act 1996 it is an offence to intentionally inflict unnecessary suffering, as specified by the Act, on any wild mammal.

APPENDIX 2 - SITE PHOTOGRAPHS



1. Asphalt hard standing to the southern side of the site (OH1)



2. Willow tree (*Salix* spp.) beyond the northern boundary (TN1)



3. Short ephemeral vegetation growing along the north-eastern fence line (ESP1)



4. Short ephemeral vegetation growing along the eastern side of the Showroom (B1; ESP1)



5. Showroom building, viewed from the south (B1)



6. Office building, viewed from the south-west (B2)



7. Warehouse, viewed from the east (B3)



8. Flat roof on the rear elevation of the showroom (B1)



9. Large glass windows on the southern elevation (B1)



10. Metal panelling tight to blockwork, eastern elevation (B1)



11. Slight gap behind fascia on the eastern gable of the warehouse (B1)



12. Metal shutters tight to the framework on the double door, northern elevation (B1)



13. Internal of the showroom, open to the ceiling with metal rafters and underside of roofing visible (B1)



14. Brickwork tight to rafters at the eastern gable (B1)



15. Slight gap between brickwork and metal rafters at the western gable (B1)



16. Broken sections of false ceiling in eastern side of the building (B1).



17. Asbestos roofing visible above aircon unit (B1)



18. Northern side open to the roof with underside of corrugated metal sheeting visible (B1)



19. Flat roof office tight to the fascia, viewed from the south-west (B2)



20. Slight gap below barge board along western elevation (B2)



21. Covered storage yard (B2)



22. Broken corrugated metal and plastic roofing sheets on storage yard (B2)



23. Water damage and damp in internal of the office (B2)



24. Corrugated asbestos roof on warehouse (B3).



25. Small gap above the blockwork, behind the gutter on the eastern elevation (B3).



26. Gap under asbestos sheets at the northern gable of the warehouse (B3)



27. Ivy growing up the north-western corner of the warehouse (B3)



28. Concrete floor throughout the internal of the warehouse (B3)



29. Corrugated asbestos roofing visible, with clear corrugated plastic skylights (B3)

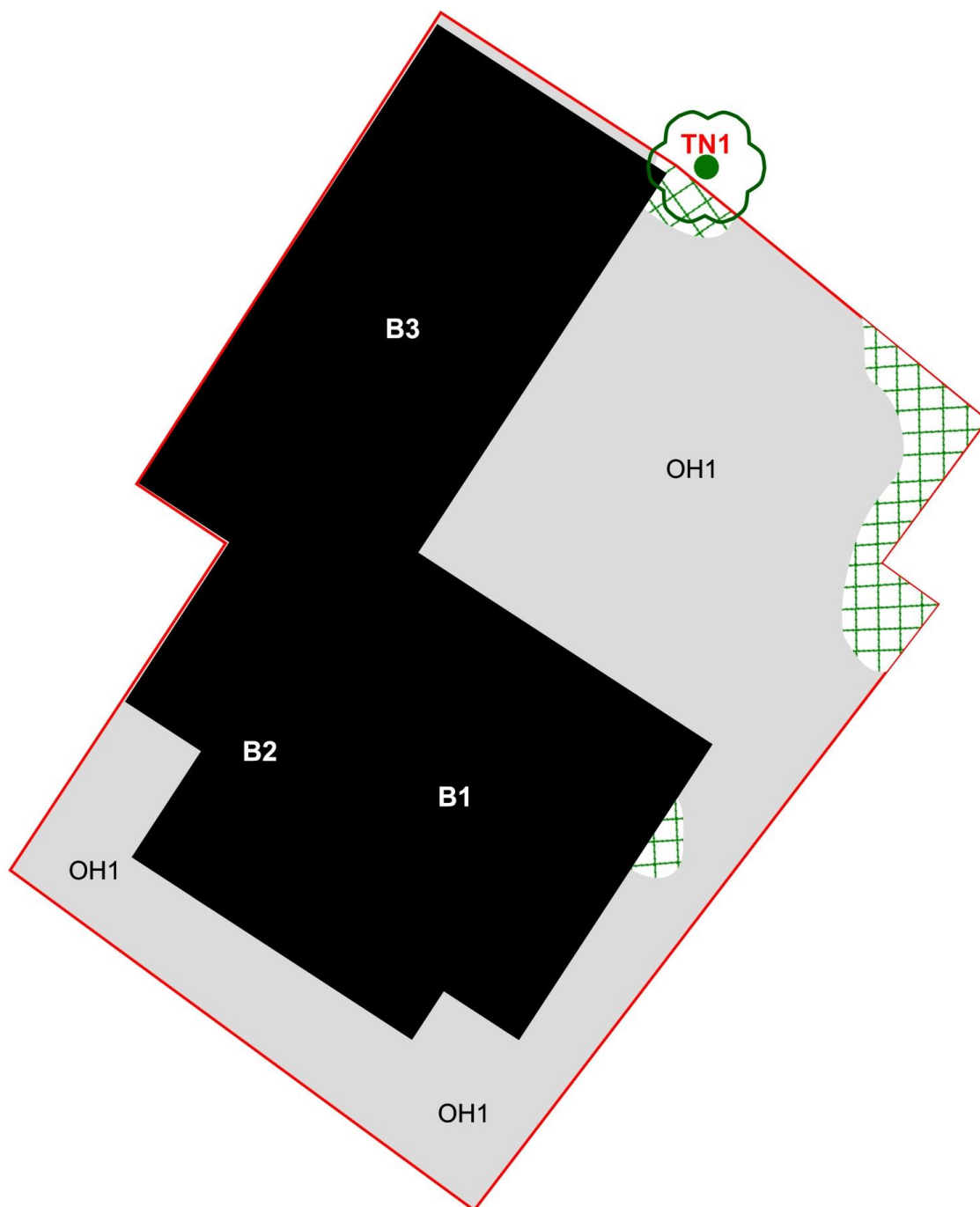


30. Daylight visible over the top of the metal double doors



31. Ivy growing over the top of the wall plate (B3)

APPENDIX 3 – PHASE 1 HABITAT SURVEY PLAN AND TARGET NOTES



n. Target note
— Survey boundary ■ Building ■ Other Habitat ■ Short ephemeral ⚙ Scattered broadleaved trees

Drawn by:	Date	Scale:	816, Oxford Road, Norcot, Reading, RG30 1EL	
MP	Oct 2021	Not to scale	Preliminary Bat Roost Assessment Findings	

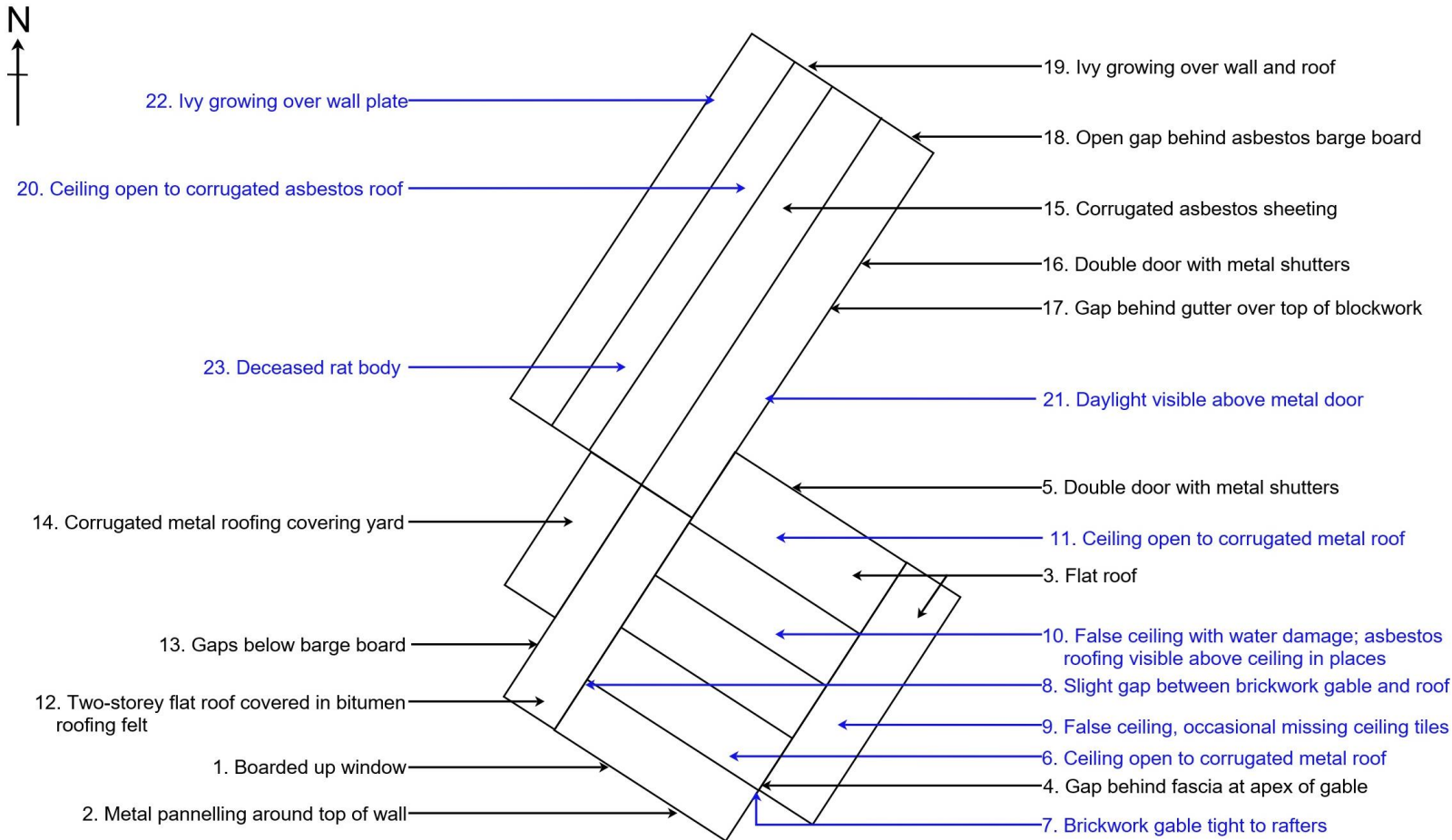
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Habitat Code	Comments
OH1	Other Habitat (Photograph 1) –The majority of the site comprised of hard-standing with areas of concrete and asphalt, with occasional bramble (<i>Rubus fruticosus</i> agg.), dandelion (<i>Taraxacum officinale</i> agg.), buddleja (<i>Buddleja davidii</i>), ragwort (<i>Jacobaea vulgaris</i>) and herb-Robert (<i>Geranium robertianum</i>).
ESP1	Short ephemeral vegetation (Photographs 3 & 4) – There was an area of short ephemeral vegetation growing up through the concrete and along the fence line in places towards the north-east of the site, along the eastern side of the showroom (B1) and below the willow tree beyond the northern boundary. Species present included: black medic (<i>Medicago lupulina</i>), horseweed (<i>Erigeron canadensis</i>), dandelion (<i>Taraxacum officinale</i>), buddleia species (<i>Buddleja davidii</i>), perennial ryegrass (<i>Lolium perenne</i>), fescue species (<i>Festuca</i> sp.), common bent (<i>Agrostis capillaris</i>), perforated St.Johns-wort (<i>Hypericum perforatum</i>), red clover (<i>Trifolium pratense</i>), ribwort plantain (<i>Plantago lanceolata</i>), yarrow (<i>Achillea millefolium</i>), nettle (<i>Urtica dioica</i>), rosebay (<i>Chamaenerion angustifolium</i>), elder (<i>Sambucus nigra</i>), hawksbeard (<i>Crepis</i> sp.), Yorkshire fog (<i>Holcus lanatus</i>), knotgrass (<i>Polygonum aviculare</i>), great mullein (<i>Verbascum thapsus</i>) and herb-Robert (<i>Geranium robertianum</i>).
TN1	Target note (Photograph 2) – Willow tree (<i>Salix</i> species) beyond northern boundary.
B1	Building (Photograph 5) – Showroom and warehouse
B2	Building (Photograph 6) – Office
B3	Building (Photograph 7) – Double warehouse

APPENDIX 4 - PLANT SPECIES RECORDED DURING THE SURVEY

Plant common name	Scientific name
Black medic	<i>Medicago lupulina</i>
Bramble	<i>Rubus fruticosus</i> agg.
Buddleia species	<i>Buddleja davidii</i>
Cock's foot	<i>Dactylis glomerata</i>
Common bent	<i>Agrostis capillaris</i>
Dandelion	<i>Taraxacum officinale</i>
Elder	<i>Sambucus nigra</i>
Fescue species	<i>Festuca</i> sp.
Hawksbeard	<i>Crepis</i> sp.
Herb-Robert	<i>Geranium robertianum</i>
Horsetail	<i>Equisetum arvense</i> .
Horseweed	<i>Erigeron canadensis</i>
Ivy	<i>Hedera helix</i>
Knotgrass	<i>Polygonum aviculare</i>
Nettle	<i>Urtica dioica</i>
Perennial ryegrass	<i>Lolium perenne</i>
Perforated St.Johns-wort	<i>Hypericum perforatum</i>
Red clover	<i>Trifolium pratense</i>
Ribwort plantain	<i>Plantago lanceolata</i>
Rosebay	<i>Chamaenerion angustifolium</i>
Great mullein	<i>Verbascum thapsus</i>
Yarrow	<i>Achillea millefolium</i>
Yorkshire fog	<i>Holcus lanatus</i>

APPENDIX 5 – BUILDING INSPECTION FINDINGS



n. External target note

n. Internal target note

Drawn by:	Date	Scale:	816, Oxford Road, Norcot, Reading, RG30 1EL	
MP	October 2021	Not to scale	Preliminary Bat Roost Assessment Findings	

APPENDIX 6 – PROPOSED PLANS



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