

16 August 2021

Our ref: 213317/ARB

Mr P Khaira
PSK Development London Limited
12 Sherbourne Close
Colnbrook
Slough
Berkshire
SL3 0PB

Dear Mr Khaira

2-4 NORTHUMBERLAND AVENUE, READING

Introduction

In accordance with your instructions, AA Environmental Limited (AAe) carried out an ecological survey of the above site on Thursday 5 August 2021. The purpose of the survey was to determine the existence and location of any ecologically valuable areas and to record any evidence of protected species, in particular bats. This information will serve to assess the ecological impact of the proposals and identify any ecological constraints and/or mitigation measures that may be required. A series of photographs has been attached for reference.

The proposals are to extend and modernise the existing properties at the rear, requiring the demolition and some alterations to the existing rear elevations. The front of each property and the majority of the rear garden areas will remain unaffected by the works.

Legislation

Currently there are 17 species of bat known to breed in the UK. All species and their roosts are protected under Regulation 41 of *The Conservation of Habitats and Species Regulations 2010 (as amended)*. As a signatory to the *Bonn Convention (Agreement on the Conservation of Bats in Europe)* the UK is also required to protect their habitats. This legislation makes it illegal to kill, injure, capture or disturb bats or to obstruct access to, damage or destroy bat roosts and protection from damage or disturbance of important feeding areas. Under the law, a roost is any structure or place used for shelter or protection.

Methodology

Baseline Data

As certain baseline data is now readily available on the internet, the Multi-agency website (www.magic.defra.gov.uk) was consulted to determine whether any part of the site or nearby habitats have been statutorily or otherwise designated and whether any European Protected Species Licences (EPSLs) for bats have been granted within 1 km of the site. In addition, a review of Google Earth's satellite imagery (http://www.google.co.uk/intl/en_uk/earth/index.html) was completed to determine past land uses of the site and surrounding land.

Walk-over Site Survey

A visual survey of the site was completed to record any evidence of bats or features that could provide potential roosting opportunities. The survey was carried out following the guidelines provided by the Bat Conservation

Trust¹. A thorough internal and external examination of the existing buildings was carried out, with any potential access points inspected for evidence of bats. All internal roof voids/spaces, where present, were accessed to check for any evidence of bats.

The surrounding habitat was also surveyed to identify any important features such as mature trees with suitable features for roosting bats and any established lines of vegetation that might provide important flightlines.

Evidence of bats is usually detected by any one or more of the following signs:

- the presence of bat droppings, which tend to accumulate under established roost sites or at roost entrances;
- the accumulation of large numbers of moth wings, which have been discarded by feeding bats;
- areas of staining by urine or from fur rubbing; and
- the presence of bats themselves or their corpses.

The visual survey was facilitated by the use of binoculars, ladders, powerful torches (1M candlepower) and a Ridgid Micro CA-350 Inspection Camera endoscope. A heterodyne bat detector (Pettersson D200) was also used during the inspection to record any bat calls.

In accordance with good practice, the site was checked for any evidence of other protected species or species of particular note.

Results

Baseline Data

According to the Multi-agency website, there are no ecologically statutory designated sites located on or directly adjacent to the site, or within the 2 km search area. There are no Habitats of Principal Importance (HPis) located on or directly adjacent to the site, with the closest being an area of Deciduous Woodland, also noted as National Forest Inventory, located approximately 0.2 km to the south of the site.

Only two bat licences have been granted within the 1 km study area both over 500 m away. One was for common and soprano pipistrelle bats, allowing damage and the destruction of a resting place, located approximately 0.6 km to the north-east of the site (ref: 2014-3941-EPS-MIT) and the other for a common pipistrelle bat, allowing damage and the destruction of a resting place, located approximately 0.9 km to the north of the site (ref: 2016-22301-EPS-MIT).

Google Earth Imagery shows that the site has remained largely unchanged since 2003 and dominated by the existing properties, with associated hardstanding and garden areas.

Site Description (Photographs 1-4)

The site is located off Northumberland Avenue in Reading, centred at National Grid Reference: SU 721719 and covers approximately 0.1 of a hectare. The site comprised the existing properties (Nos. 2 and 4), with associated hardstanding and some boundary vegetation. It is bordered by Northumberland Avenue to the east, offices to the west and residential properties and associated gardens to the north and south.

The two semi-detached properties were of masonry construction with a pitched roof of engineered tiles. The upper stories were rendered and painted and the front gables had a mock-tudor timber effect. The timbers, barge boards and soffits/fascias were generally well-maintained and tightly sealed. There were single-storey extensions at the rear with single pitched tiled roofs. There was a single dormer window at the rear of No. 4 with timber cladding and a small section of tile hanging (engineered tiles). Internally, the majority of the roof

¹ Collins, J. (ed) (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). The Bat Conservation Trust, London.

spaces had been converted into accommodation, with restricted roof and eaves spaces present, which were unlined and insulation with mineral wool.

The small rear gardens were set to lawns, with some ornamental planting restricted to conifers (*Cupressaceae* sp.) and roses (*Rosa spp.*), along with some self-seeded sycamore saplings (*Acer pseudoplatanus*).

Bats

No evidence of bats was recorded during a careful internal and external inspection of each property. The properties were in overall good condition and the roof tiles generally well-aligned and tightly-sealed, with no obvious access points recorded. The areas of engineered tile hanging were carefully inspected, getting up close using ladders and were found to be generally well aligned and sealed. In addition, the timbers and soffits/fascias were generally tightly sealed, with any restricted gaps present found to be covered with cobwebs and/or general debris. Internally, the majority of the roof space had been converted into accommodation leaving only restricted areas of roof and eave spaces. These were fully accessed and found to be unlined, with the tiles attached directly onto the wooden battens, insulated with mineral and dusty and cobwebbed throughout.

The timber framed garden sheds at the rear of each plot were assessed to provide **negligible** opportunities for roosting bats given their construction type, lacking any separate roof void and/or crevice dwelling opportunities. These will remain unaffected by the works.

There were no established trees recorded on the site and the site, being dominated by the properties set within a built up and well-lit urban location provides very limited foraging habitat for bats.

Other Wildlife

Apart from a few common species of birds recorded flying overhead, no other species of any note were recorded.

Conclusions and Recommendations

The proposals are to extend and modernise the existing properties at the rear, requiring the demolition and some alterations to the existing rear elevations. The front of each property and the majority of the rear garden areas will remain unaffected by the works.

There are no habitats of international, national, county or local importance that would be directly or indirectly affected by the proposals. The site is of overall low ecological value, with the species recorded described as common or abundant and are found in similar places across much of Britain, with no evidence of protected species recorded.

A thorough examination of each property was completed, with all potential access points and/or roosting opportunities fully inspected for evidence of bats. The roof spaces were restricted and fully accessed and not complex allowing a thorough inspection and, therefore, there are considered to be no constraints to the survey findings. Although no evidence of bats was recorded, it is recommended that the restricted area of tile hanging at the base of the dormer window at the rear of No. 4 is carefully removed by the appointed contractor using soft-strip methods, with the following controls implemented:

- all site operatives will be given a toolbox talk on the possibility of encountering bats and the legal protection they and their roosts are afforded (copy of a toolbox talk has been attached for reference);
- initial works will be carried out with great care, with the areas of tile hanging removed by hand, lifting each tile clear with two hands rather than lifting the front and rolling the tile backwards which may crush any bats beneath; and
- tiles will also be checked underneath before being stacked or discarded as bats sometimes cling to the underside of tiles.

In the unlikely event that any evidence of bats is encountered, works will cease immediately, and Natural England contacted so that appropriate advice can be provided (**N.B. a European Protected Species Licence may then be required to permit the works to continue**).

In addition to the above specific measures, a series of generic mitigation measures, as detailed below, could be implemented to reduce any impact the development proposals may have on local wildlife. There is also an opportunity to implement some enhancement measures to increase the nature conservation value of the site in the long term in accordance with Government guidance as set out in National Planning Policy Framework (NPPF) 2021².

It should be noted that all species of wild bird and their nests are protected under the *Wildlife and Countryside Act 1981 (as amended)*. Although no active or old nests were recorded during the survey, a check should be carried out prior to any works to ensure there are no active nests present.

In order to protect any adjacent established vegetation, suitable fencing may be required at certain locations to reduce the possibility of any damage that could be caused during the works. To minimise accidental damage, any overhanging branches should be pruned back to suitable live growth points. All works should be undertaken by a suitably qualified and experienced specialist contractor and should conform to current industry best practice, i.e. BS 3998: 2010 '*Tree Work - Recommendations*'.

Although the works are restricted with limited opportunities to implement any enhancement measures, a series of bird/bat boxes could be installed on site to provide enhanced nesting/roosting opportunities. Any boxes installed should be positioned in accordance with good practice.

The effects of lighting on plants and animals are difficult to assess, but it is thought that lighting can adversely affect invertebrates, birds and bats. Although the site is located in a well-lit area, any new lighting to be introduced should be designed to minimise light spillage and pollution and not directed onto any bird/bat boxes installed.

The recommendations provided above try to pre-empt any issues that may arise as well as provide some mitigation and enhancement measures. I trust this is of interest to you and provides the Local Planning Authority with enough information to determine the application but let me know if further clarification is required.

Yours sincerely



Alan Beaumont
BSc (Hons) MSc MCIEEM
Class Licences CL08 and CL18

Encls. Photograph Record Sheet (Drg. No. 213317/01)
Toolbox Talk (Bats)

² Ministry of Housing, Communities and Local Government (2021). *National Planning Policy Framework*. London.



Photograph 1: Showing the front of the properties.



Photograph 2: Showing the rear of the properties.



Photograph 3: Showing the restricted area of tile hanging on the bottom of the rear dormer.



Photograph 4: Showing one of the restricted attic spaces, which was unlined and heavily dusty and cobwebbed throughout.

Rev.	Details	Drawn Chkd.	Date
PROJECT			
2-4 Northumberland Avenue Reading			
TITLE			
Photograph Record Sheet			
 AAe Environmental Consultants AA Environmental Ltd Units 4-8 Cholswell Court Shippon Abingdon Oxon OX13 6HX T: 01235 536042 F: 01235 523849 info@aae-ltd.co.uk www.aae-ltd.co.uk			
Scale	Date 16.08.21	Drg No.	Rev.
NTS	Drawn LT	Chkd. ARB	213317/01

TOOLBOX TALK:

BATS

Did you know?

- Bats are the world's only flying mammal.
- There are 17 species of bat known to be breeding in the UK, 6 of which are endangered or rare and 6 are classed as vulnerable.
- Bats can be found across the country in urban and rural locations.
- They are often sighted at dusk as they leave their roost, flying around hedgerows, woodland and waterbodies, feeding on insects.
- Throughout the year bats will often change their roost, depending upon the season.
- Usually a pregnant female will only have one baby a year, this makes colonies vulnerable to population decline.
- During the winter bats hibernate and may not wake up, even if disturbed. Therefore it's important not to work on sites with bats during these months.
- Bats may not use the same roost throughout the year, however they are legally protected with or without a bat occupying them.

Identification

- You may find bats in any number of places, they tend to prefer dark, quiet spots with good shelter, such as holes and cracks in trees, roofs and walls of buildings, under bridges, old tunnels and in caves.
- Signs of bat presence include discarded moth wings, staining around crevices and small mouse-like droppings which crumble easily.

Legislation

- All bats and their roosts are protected by UK and European Law. This makes it **illegal to kill, injure, capture or disturb bats** or obstruct access to, damage or destroy their roosts and protects important feeding areas from damage or disturbance.
- Under law, a roost is any structure or place used for shelter or protection.

Site Controls

- There is always a **risk** that bats, as they move between different roost sites and occupy new roosts, could be encountered during site works.
- **If any bats are encountered during works the following controls must be applied to avoid breaking the law:**
 1. If bats are discovered/suspected works must stop **immediately** with any bat left in-situ and AAe immediately contacted (contact details above).
 2. If any injured bats are found during the works AAe would care for them and where possible be released in the same location once recovered.
 3. During works staff must wear gloves in case of accidental contact with bats.
 4. Any roof tiles will be lifted straight up, rather than being rolled over, minimising the risk of harming bats which may be sheltering underneath.
 5. Areas must be fully checked for any bats or their evidence prior to filling any gaps and repointing any brickwork.
 6. Any lighting must be installed must avoid illuminating vegetation and or bat boxes/access points.

These controls have been put in place to protect all site operatives from breaking the law. You're not expected to be able to identify bats or their presence so remember, **if in doubt shout and contact the relevant person.**

Key Contacts

AA Environmental Ltd, Units 4-8 Cholswell Court, Shippon, Oxfordshire, OX13 6HX
Tel: 01235 536042



Brown long-eared bat.



Lesser horseshoe bat in rail tunnel.



Common pipistrelle bat.