

Technical Appendix 2.3: Ecological Impact Assessment

Intended for
Aviva Life & Pensions UK Limited

Date
February 2020

Project Number
1700003910

READING STATION SHOPPING PARK ECOLOGICAL IMPACT ASSESSMENT



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Project No. **1700003910**
Issue No. **2**
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Version Control Log

Revision	Date	Made by	Checked by	Approved by	Description
1	12/12/19	SY/CS	LS	ME	First Issue for Client Review
2	14/02/20	SY/CS	LS	ME	Final Issue for Planning Submission

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EXECUTIVE SUMMARY

Ramboll UK Ltd was commissioned by Aviva Life & Pensions UK Limited to undertake an Ecological Impact Assessment of the Reading Station Shopping Centre re-development. The proposals include the construction of up to four new buildings, along with associated car parking, cycle storage, open space and landscaping.

The content of this report is based on the findings of an extended Phase 1 Habitat survey undertaken on 02 April 2019.

Habitats within the application site comprised buildings with associated hardstanding areas used as paths and car parking, scattered trees, introduced shrub, amenity grassland and bare ground. The habitats present on the application site were considered to be of Negligible to Site level importance and are therefore not a significant constraint to development, beyond their potential to support protected species.

The application site could support species including invertebrates, breeding birds and foraging/commuting bats, and a number of recommendations are made concerning these species.

Mitigation and enhancement measures have been recommended to reduce residual negative effects on biodiversity and to increase the ecological value of the application site post development. These measures include the adoption of a Construction Environmental Management Plan, timing of vegetation clearance works to avoid impacts on nesting birds, introducing a landscape planting plan which includes native species or species with a known value to wildlife, and the provision of bat and bird boxes.

By undertaking the work in accordance with the recommendations in this report, the proposed development would be in conformity with relevant planning policy and legislation relating to ecology.

1. INTRODUCTION

1.1 Background

Ramboll UK Limited ('Ramboll') was commissioned by Aviva Life & Pensions UK Limited (the 'Applicant') to undertake an Ecological Impact Assessment (EcIA) of a site at Reading Station Park, Reading (the 'application site') in advance of the application site's redevelopment (the 'proposed development'). The application site is located at OS grid reference SU 7141 7406, as shown in Figure 1.1. The application site is within the jurisdiction of Reading Borough Council (RBC).

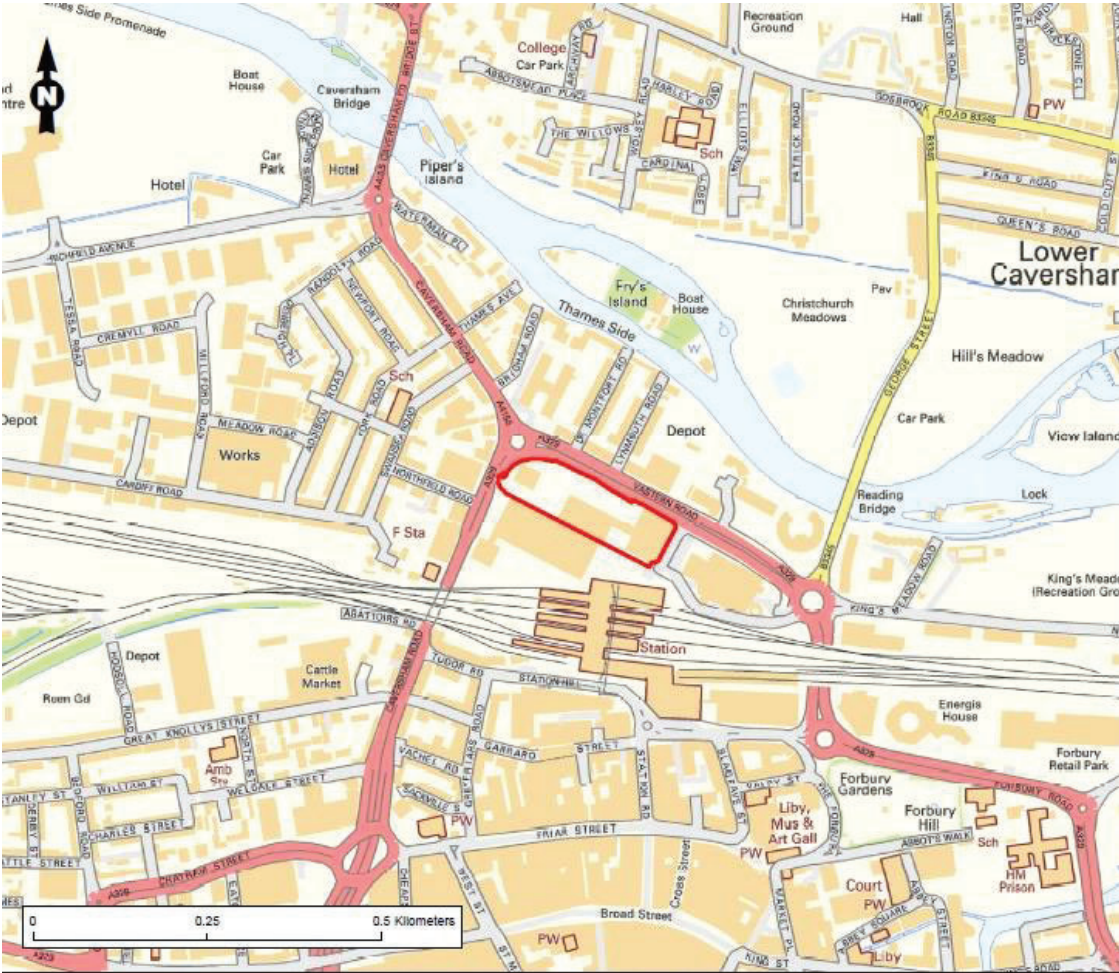


Figure 1.1: Application Site Location

1.2 Objectives

The aim of this report is to provide an EcIA in relation to the application site and the zone of influence (ZoI) of the proposed development (CIEEM, 2018)¹. The ZoI is the area over which ecological features may be affected by the biophysical changes caused by the proposed development and its associated activities.

The EcIA comprises a description of the existing on-site ecological conditions, as well as the ecological context of the application site and its ZoI; an appraisal of the application site's ecological value; and an assessment of likely impacts in relation to the proposed development and its associated activities, taking into account the mitigation and enhancement measures incorporated into the proposed development. The structure and content of the

¹ CIEEM (2018) Guidelines for Ecological Impact Assessment in the United Kingdom and Ireland: Terrestrial, Freshwater and Coastal. Chartered Institute of Ecology and Environmental Management, London.

report is based on current ecological report writing guidance (CIEEM, 2017² and BSI Standards Institution, 2013³).

The objectives of this report are to:

- identify designated nature conservation sites located either within the application site or the ZoI of the proposed development;
- assess the potential for the application site and the ZoI of the proposed development to support populations of protected species or species of nature conservation importance⁴;
- record the main habitats and features of ecological interest on the application site; and
- assess the ecological importance of the application site;
- provide recommendations for any additional further surveys (if required); and
- provide recommendations for the protection and enhancement of the application site's ecological features.

The content of this report is based on the findings of:

- a desk study;
- an extended Phase 1 habitat survey; and
- a daytime inspection of buildings, structures and trees for bats.

The report is supported by the following appendices:

- Appendix 1: Figures;
- Appendix 2: Relevant Legislation and Policy Context; and
- Appendix 3: Site Photographs.

1.3 Proposed Development

Outline planning permission is being sought, with the details of access, appearance, landscaping, layout and scale reserved for later determination. The proposed development would comprise:

- Demolition of existing on-site buildings;
- Construction of four new builds (Blocks A - D);
- Provision of up to 115,000 m² GEA in one or more land uses comprising:
 - residential (Class C3 and including Private Rental Sector);
 - offices (Use Class B1(a)); and
 - development in use classes A1, A2, A3 (retail), A4 (public house), A5 (take away), C1 (hotel), D1 and D2 (community and leisure).
- Provision of associated facilities, including:
 - car parking;
 - new plant and renewable energy equipment; and

² CIEEM (2017) Guidelines on Ecological Report Writing. Chartered Institute of Ecology and Environmental Management, Winchester

³ BSI Standards Institution, 2013. BS 42020:2013. Biodiversity – Code of Practice for Planning and Development. BSI Standards Limited, London.

⁴ The following species are considered to be of nature conservation importance i) listed as a national priority for conservation (such as those listed as habitats and species of principal importance for the conservation of biodiversity under Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006; ii) listed as a local priority for conservation, for example in the relevant local Biodiversity Action Plan (BAP); iii) assessed as a threatened or near-threatened species according to International Union for the Conservation of Nature (IUCN) red list criteria; iv) Red or Amber Listed species in national Species of Conservation Concern assessments; v) listed as a Nationally Rare or Nationally Scarce species (e.g. in one of the Species Status Project reviews) or a Nationally Notable species where a more recent assessment of the taxonomic group has not yet been undertaken; and/or vi) endemic to a country or geographic location (including endemic sub-species, phenotypes, or cultural behaviours of a population that are unique to a particular place).

- servicing areas and associated services (including waste, refuse, cycle storage, and lighting);
- Creation of open space and landscape areas.

1.4 Legislation and Policy Framework

Various legislation and planning policies refer to the protection of wildlife. Relevant legislation and policy are summarised in Appendix 2 but should not to be regarded as a definitive legal opinion. When dealing with individual cases, the full texts of the relevant documents should be consulted, and legal advice obtained if necessary.

1.5 Legal

This report has been prepared by Ramboll exclusively for the intended use by the Applicant in accordance with the agreement between Ramboll and the Applicant defining, among others, the purpose, the scope and the terms and conditions for the services. No other warranty, expressed or implied, is made as to the professional advice included in this report or in respect of any matters outside the agreed scope of the services or the purpose for which the report and the associated agreed scope were intended or any other services provided by Ramboll.

Ramboll’s services are not intended as legal advice, nor an exhaustive review of site conditions and/or compliance. This report and accompanying documents are initial and intended solely for the use and benefit of the Applicant for this purpose only and may not be used by or disclosed to, in whole or in part, any other person without the express written consent of Ramboll. Ramboll neither owes nor accepts any duty to any third party, unless formally agreed by Ramboll through that party entering into, at Ramboll’s sole discretion, a written reliance agreement.

Unless otherwise stated in this report, the scope of services, assessment and conclusions made assume that the site will continue to be used for its current purpose and end-use without significant changes either on- or off-site.

2. METHODOLOGY

2.1 Desk Study

The purpose of the desk study was to collect existing baseline data about the application site and the ZoI, such as the location of designated sites or other natural features of potential ecological value such as woodland and ponds. The following ZoI has been considered:

- All statutory designated sites up to 1 km from the application site, including Special Areas of Conservation (SAC), Special Protection Areas (SPA), National Nature Reserves (NNR), Sites of Special Scientific Interest (SSSI) and Local Nature Reserves (LNR);
- Non-statutory designated sites: Local Wildlife Sites (LWS’s), ancient woodland and Habitats of Principal Importance (HPI) up to 1 km from the application site; and
- Records of protected species up to 1 km from the application site.

Thames Valley Environmental Records Centre (TVERC) was contacted to provide details of designated sites and protected species within 1 km of the application site (Report Ref. TVERC/18/739, dated 09 April 2019). Due to data ownership restrictions in the reproduction of the TVERC report, it is not appended to this EcIA, but the information provided is summarised in the relevant sections.

In addition, the Multi Agency Geographic Information for the Countryside (MAGIC) website⁵ was searched for supplementary information on statutory sites. This included a search for European Protected Species licences issued within 1 km of the application site. Supplementary information on the application site and its surroundings were obtained from aerial images available from Google™ Earth.

2.2 Extended Phase 1 Habitat Survey

An extended Phase 1 habitat survey of the application site was undertaken by Sharon Yardy BSc (Hons) MSc ACIEEM on 02 April 2019. Sharon has a BSc in Ecology and an MSc in Applied Ecology and Conservation and has worked professionally as an ecologist since 2015. The weather during the survey period was light rain.

The survey involved a site walkover and preliminary assessment of key habitats, land use and ecological features, particularly focusing on areas of natural interest which will be affected by the proposed development. The main habitats present were recorded using standard Phase 1 Habitat survey methodology as described in the Handbook for Phase 1 Habitat Survey (JNCC, 2010)⁶. Target notes were used to record habitats and features of particular interest. In addition to general habitat classification, a list was compiled of observed plant species (using the nomenclature of Stace, 2019⁷, with common and Latin names referred to in the first instance after which only the common names are used). The abundance of each species was estimated for each habitat respectively using standard ‘DAFOR’ codes:

- D = Dominant.
- A = Abundant.
- F = Frequent.
- O = Occasional.
- R = Rare.

⁵ www.magic.gov.uk, accessed 12 March 2019

⁶ Joint Nature Conservation Committee (JNCC) (2010). Handbook for Phase 1 Habitat survey – a technique for environmental audit. JNCC Peterborough

⁷ Stace, C. (2019) New Flora of the British Isles 3rd Edition. Cambridge University Press

The application site was assessed for its potential to support protected and notable species such as reptiles and bats and was inspected for signs of any invasive plant species subject to legal controls. This was in order to identify potential ecological constraints and to guide recommendations for further survey requirements for these species.

2.3 Daytime Building and Tree Inspection for Bats

A daytime inspection of buildings, trees and structures was completed on 02 April 2019 during the extended Phase 1 habitat survey by Sharon Yardy. Sharon holds a Natural England (NE) Level 2 Licence for bats (Natural England licence number 2017-28708-CLS-CLS). The exterior elevations of the application site’s building, structures and trees were visually inspected for field evidence of roosting bats including droppings, urine staining, feeding remains and potential roosting points. In accordance with the guidance outlined in Bat Surveys for Professional Ecologists: Good Practice Guidelines 3rd edition (Collins, 2016)⁸ each building was assessed for its potential to support bats. The following building types and features are considered to be of particular suitability to support roosting bats:

- Buildings of pre-20th or early 20th century construction;
- Agricultural buildings of brick, stone or timber construction;
- Large and complicated roof void(s) with unobstructed flying spaces;
- Large (>20 cm) roof timbers with mortise joints, cracks and holes;
- Entrances into buildings for bats to fly through;
- Poorly maintained buildings such that they provide access points for bats into roofs, walls, bridges, but at the same time not being too cool and draughty;
- Roof warmed by the sun e.g. south facing;
- Weatherboarding and/or hanging tiles with gaps;
- Undisturbed building roofs and structures;
- Buildings and built structures in proximity to each other providing a variety of roosting opportunities throughout the year; and
- Buildings and built structures close to good foraging habitat e.g. mature trees, parkland, woodland or wetland.

The following tree features are considered of particular suitability to support roosting bats:

- Natural holes;
- Woodpecker holes;
- Cracks / splits in major limbs;
- Loose bark;
- Bat, bird or mammal boxes;
- Partially detached large-stemmed ivy; and
- Other hollows / cavities.

Each building has been classified into a category dependent on the presence of features suitable to support bat roosts. The categories assigned were: Confirmed Roost, High, Moderate, Low and Negligible Potential for use by bats. Trees have only been classified if it has potential to support bats.

Table 2.1 below provides criteria for each of these categories. In addition, the suitability of the application site for foraging and commuting bats was assessed.

⁸ Collins, J. (2016). Bat Surveys for Professional Ecologists: Good Practice Guidelines (3rd edition). Bat Conservation Trust (BCT)

Table 2.1: Building, Structure and Tree Bat Roost Potential Categories	
Roost Potential	Description
Confirmed	A building, structure or tree that is confirmed to support a bat roost.
High	A building, structure or tree with one or more potential roost site that is obviously suitable for use by larger numbers of bats on a regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate	A building, structure or tree with one or more potential roost site that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status.
Low	A building or structure with one or more potential roost site that could be used by individual bats opportunistically. However, these potential roost sites do not provide enough space, shelter, protection and / or suitable surrounding habitat to be used on a regular basis or by a large number of bats (i.e. unlikely to be suitable for hibernation or maternity). Trees of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with very limited roosting potential.
Negligible	Negligible habitat features likely to be used by roosting bats and bats very unlikely to be present.
Notes: Category descriptions drawn from Collins (2016)	

2.4 Assessment of Importance of Ecological Features

The importance of ecological features (i.e. designated sites, habitats and species), identified within the ZoI has been assessed using a scale that classifies ecological features within a defined geographic context in accordance with CIEEM guidelines (2018)⁹. The following frame of reference has been used for the application site:

- International and European Importance;
- National Importance (England);
- Regional Importance;
- County Importance (Berkshire);
- Local Importance;
- Site-level Importance (limited to the application site boundary or ZoI); and
- Negligible Importance.

Various characteristics contribute to the importance of ecological features. These include recognised and published criteria (e.g. Ratcliffe, 1977¹⁰, Wray *et al.* 2010¹¹) where the ecological features are assessed in relation to their size, diversity, naturalness, rarity, fragility, typicalness, connectivity with surroundings, intrinsic value, recorded history and potential value.

A wide range of sources can be used to assign importance to ecological features, including legislation and policy. In the case of designated sites, their importance reflects the geographic context of the designation. For example, sites designated as Special Areas of

⁹ CIEEM, 2018. Guidelines for Ecological Impact Assessment in the UK and Ireland: Terrestrial, Freshwater and Coastal.

Chartered Institute for Ecology and Environmental Management, Winchester.

¹⁰ Ratcliffe, D.A. (Ed). (1977) A Nature Conservation Review. 2 vols. Cambridge University Press.

¹¹ Wray S, Wells D, Long E, Mitchell-Jones T. (2010) Valuing Bats in Ecological Impact Assessment, CIEEM In-Practice. 23-25

Conservation (SACs) are recognised as being of importance at an International level. Ecological features not included in legislation and policy may also be assigned importance, due to, for example, local rarity or decline, or provision of a functional role for other ecological features. Professional judgement is used to assign such importance.

2.5 Method of Assessment

The EcIA has been undertaken by means of existing good practice tools and techniques as recommended by CIEEM. As such, potential impacts and effects on ecological features (as defined by baseline conditions) have been assessed taking into consideration mitigation measures integral to the proposed development; consideration has been given to the need for additional mitigation to reduce or offset potential significant effects, and finally all residual effects have been assessed as either significant or not significant at the relevant geographic level. As part of this, consideration was given to the avoidance, mitigation, restoration, compensation and enhancement measures (the 'mitigation hierarchy') integral to the proposed development.

2.6 Significance

The potential impacts on ecological features were considered in relation to the proposed development at the application site. The assessment was made by reference to the pre-development baseline conditions at the application site. The impacts have been characterised according to the following variables:

- Magnitude and extent - quantitative size of an impact (e.g. area of habitat/number of individuals);
- Timing – when the impact may occur;
- Duration and reversibility - timescale of impact (days/weeks/months/years) until recovery. Permanent impacts are described as such, and likelihood of recovery is detailed where appropriate;
- Frequency - frequency of impact (if appropriate; described as low to high and quantified where possible);
- Complexity - whether the impact will directly or indirectly affect the feature; and
- Negative/positive - if the impact will be beneficial or detrimental to the feature.

The assessment only describes those characteristics relevant to the ecological effect when determining the significance. For example, timing of when a habitat is destroyed may not be relevant in relation to the assessment of the effect on the habitat. However, it may be relevant to assess the impact to the species that occur within the habitat (e.g. roosting bats).

In accordance with CIEEM guidance, each impact has been assessed as having a significant effect or not having a significant effect upon each ecological feature qualified with reference to the appropriate geographic scale. The importance level of the ecological feature concerned may be a determinant of the geographical level at which the effect is significant. For example, a significant effect to a Site of Special Scientific Interest (SSSI), is likely to be significant at a national level. However, it may be the case that the effect could be considered significant at a lower or higher geographical level than that at which the feature is important, depending on the magnitude of the effect. A significant effect is an effect that either enhances or undermines the conservation objectives of an ecological feature. Conservation objectives may be specific (e.g. for a designated site), or broad (e.g. national conservation policy).

2.7 Limitations

The ecological assessment has been undertaken based on CIEEM's 2017 Guidelines for Preliminary Ecological Appraisal¹² and CIEEM EcIA guidelines (2018), taking a proportional approach to the level of survey effort and reporting required due to the small size and urban nature of the application site.

It should be noted that availability and quality of the data obtained during desk studies is reliant on third party responses, for example from local bat groups. This varies from region to region and for different species groups. Furthermore, the comprehensiveness of data often depends on the level of coverage, the expertise and experience of the recorder and the submission of records to the local recorder.

The extended Phase 1 habitat survey provides a snapshot of ecological conditions and does not record plants or animals that may be present at the application site at different times of the year. The survey was undertaken within the optimum period for Phase 1 habitat surveys (April to September).

The absence of a particular species cannot definitely be confirmed by a lack of field signs and only concludes that an indication of its presence was not located during the survey effort.

A small narrow fenced off area was present at the south of the application which could not be physically accessed (TN1 on Appendix 1, Figure 1). It could be viewed from the edge however and determined that the habitat present was of limited value. The lack of access is therefore not considered a significant constraint to the assessment.

Ramboll is satisfied that this report represents a robust appraisal of the application site. If any action or development has not taken place on this land within 12 months of the date of this report, the findings of this survey should be reviewed by a suitably qualified ecologist and may need to be updated.

¹² CIEEM (2017). Guidelines for Preliminary Ecological Appraisal, Second Edition. Chartered Institute of Ecology and Environmental Management (CIEEM), Winchester

3. BASELINE CONDITIONS

3.1 Desk Study

3.1.1 Landscape Context

The application site is located in Reading town centre and encompasses a shopping centre and associated hard standing. The application site is bounded by roads to the north (Vastern Road), east (Trooper Potts Way) and west (Caversham Road). Buildings, hard standing and beyond these railway lines are located to the south. The immediate surroundings are urban, with the River Thames approximately 150 m to the north-east. The Kennet and Avon Canal, which is connected to the River Thames is situated 700 m to the south-east.

3.1.2 Designated Sites

Statutory Sites

The application site does not fall within a statutory designated site, nor are there any statutory designated sites within 1 km of the application site.

Non-Statutory Sites

TVERC identified three LWS's within 1 km of the application site. These are listed in Table 3.2. No further designated sites were identified within 1 km of the application site.

Table 3.1: Local Wildlife Sites within 1 km of the Application Site				
Name	Type	Location	Area (ha)	Reason for Designation
Cow Lane Depot	LWS	700 m to south-west	1.54	Habitats include mature trees, scrub, open water with swamp and tall herb grassland
The Warren Woodlands Complex	LWS	900 m to north-west	7.64	Woodland complex of six sites
The Coal, Kennetmouth and Kings Meadow East	LWS	950 m to east	3.62	Habitats include mature trees, river banks with wetland species and areas of grassland

3.2 Other Habitats of Conservation Importance

Ancient Woodland

No parcels of ancient woodland were identified on MAGIC within 1 km of the application site.

Habitats of Principal Importance (HPIs)

There are several parcels of HPIs within 1 km, which are listed under the Natural Environment and Rural Communities (NERC) Act 2006, including deciduous woodland and good quality semi-improved grassland. The nearest of these is over 250 m away and to the north-east the application site.

3.3 Habitats

The following descriptions of habitats should be read in conjunction with the Extended Phase 1 Habitat Plan in Appendix 1.

3.3.1 General Site Description

The application site is dominated by buildings and hardstanding with small areas of amenity grassland, introduced shrub, bare ground and scattered trees.

3.3.2 Buildings

There are two buildings on the application site: Building 1 and Building 2.

Building 1 consists of a complex of three interconnected two-storey warehouse buildings, currently in use as commercial spaces. The facades are covered with a combination of red brick, glass and corrugated metal; and appeared to be in good condition. The roof, which is a slight pitch, is also covered in corrugated metal. There are soffits present, constructed from a combination of timber and UPVC.

Building 2 is a rectangular two-storey building, with a façade constructed from redbrick and glass. The building has two conjoined section. The larger section has a hipped roof, covered with slate, while the smaller section has a cupula on the roof, covered with slate and with a louvred vent on each side of the cupula.

Building 1 and Building 2 are of Negligible ecological importance.

3.3.3 Hardstanding

Approximately 50 % of the application site is covered with areas of hard standing. This includes the asphalt access road, car parking and pavements.

Hardstanding is of Negligible ecological importance.

3.3.4 Amenity Grassland

Amenity grassland is present around the northern and western edge of the application site. Species present include abundant perennial rye-grass *Lolium perenne* along with occasional yarrow *Achillea millefolium*, ribwort plantain *Plantago lanceolata*, daisy *Bellis perennis* and cut-leaved cranesbill *Geranium dissectum*. Species present rarely include bulbous buttercup *Ranunculus bolbosus* and lesser celandine *Ficaria verna*. Sward height was generally below 3 cm at the time of the survey and appears closely managed and maintained.

Amenity grassland is a common habitat. The sward height is low which limits its value for wildlife, especially invertebrates. It is therefore considered to be of Site level ecological importance only.

3.3.5 Introduced Shrub

There are small areas of introduced shrub at the centre and north of the application site. Species present include frequent Mexican orange blossom *Choisya ternata*, ivy *Hedera helix*, hebe *Hebe* spp., together with frequent Oregon grape *Mahonia aquifolium*, Photinia *Photinia x fraseri* and cherry laurel *Prunus laurocerasus*.

The areas of introduced shrub provide common habitat and are considered to be of Site level ecological importance only.

3.3.6 Scattered Broadleaved Trees

Scattered trees (18 no.) are present within the amenity grassland and introduced shrub on the application site. Species present include London Plane *Platanus x acerifolia*, apple *Malus* sp., rowan *Sorbus acuparia* and Norway maple *Acer platanoides*; and are a combination of mature and semi-mature.

Scattered trees, especially when mature, have a value not just in terms of their potential to support wildlife but also due to their intrinsic and landscape value. The wider landscape contains a large amount of broadleaved woodland and considering many of the scattered trees on the application site are either introduced or semi-mature, these can be considered to be of Site level ecological importance only.

3.3.7 Bare ground

There is a small strip of bare ground present at the east of the application site, adjacent to Building 1. Bare ground is of Negligible ecological importance.

3.4 Species

3.4.1 Invertebrates

TVERC provided records of a number of invertebrate species identified within 1 km of the application site including 20 records of stag beetle *Lucanus cervus*, listed as an Annex II species under the Conservation of Habitat and Species Regulations 2017. Other species included Species of Principal Importance (SPI) under the Natural Environment and Rural Communities (NERC) Act 2014, such as the butterfly small heath *Coenonympha pamphilus* and the dragonfly common club-tail *Gomphus vulgatissimus*.

The application site includes limited habitat to support invertebrates, with the amenity grassland, introduced shrub and trees suitable to support assemblages of common invertebrate species. There is no dead wood present on the application site suitable to support stag beetles. The application site is unlikely to support significant populations of rare or protected invertebrates due to it comprising largely hardstanding and buildings in an urban setting.

Based on the above, the application site is considered to be of Site level ecological importance for use by common invertebrate assemblages.

3.4.2 Amphibians

TVERC provided one record for great crested newt *Triturus cristatus* within 1 km of the application site. Other records included smooth newt *Lissotriton vulgaris*, common toad *Bufo bufo* and common frog *Rana temporaria* within 1 km of the application site.

There is no aquatic habitat present within the application site or within the vicinity, nor suitable terrestrial habitat which could support amphibians. The great crested newt record was 580 m to the north-east of the application site, to the north of the River Thames which is likely to form a barrier to dispersal. Water bodies identified within 500 m were all north of the River Thames. The application site is therefore considered to have Negligible potential to support great crested newt.

Based on the above, the application site is considered to be of Negligible ecological importance for great crested newt and other amphibians.

3.4.3 Reptiles

TVERC returned three records of slow-worm *Anguis fragilis* within 1 km of the application site. However, the application site does not offer suitable habitat for reptiles. The application site is widely dispersed and lacks connectivity to offsite areas which would support this species. The 'cut off' nature of the application site, i.e. surrounded by walls, roads and buildings, limits the potential for a reptile population to become established.

Based on the above, the application site is considered to be of Negligible importance for reptiles.

3.4.4 Birds

TVERC provided records for a number of notable bird species which are protected under Schedule 1 of the Wildlife and Countryside Act 1981 (WCA) and/or listed as SPIs under Section 41 of the NERC Act or Birds of Conservation Concern (BoCC) red or amber lists. Notable species recorded within 1 km of the application site include black redstart *Phoenicurus ochruros*, swift *Apus apus*, house martin *Delichon urbicum*, bullfinch *Pyrrhula pyrrhula* and starling *Sturnus vulgaris*.

The application site is unlikely to support large numbers of rare or notable species of bird given the application site is predominantly covered by hard standing and buildings. Hardstanding is not valuable as either nesting or foraging habitat for birds. Black redstart records are south of the application site, with the nearest one approximately 250 m to the south of the application site. The buildings within the application site were considered unlikely to have crevices or holes suitable for black redstart nesting. The introduced shrub and trees could offer limited potential for common bird species for nesting purposes, while the application site as a whole may offer foraging potential for common bird species.

Based on the above, the application site is considered to be of Site level ecological importance for use by common species of nesting and foraging bird.

3.4.5 Bats

TVERC returned records of six species of bat within 1 km of the application site including serotine *Eptesicus serotinus*, Daubenton's bat *Myotis daubentonii*, noctule *Nyctalus noctula*, common pipistrelle *Pipistrellus pipistrellus*, soprano pipistrelle *Pipistrellus pygmaeus* and brown long-eared bat *Plecotus auritus*.

There were three granted European Protected Species Mitigation (EPSM) licence applications for bats identified on MAGIC within 1 km of the application site. These were for common pipistrelle, soprano pipistrelle and Daubenton's bat.

No signs of bats were recorded externally on Building 1 or 2 during the extended Phase I habitat survey.

Building 1 did not contain external features which could support roosting bats and is considered to have Negligible potential to support roosting and hibernating bats.

Building 2 contained a limited number of features that could potentially support bats, including two areas with slight damage to the fascia boards and two slipped tiles on the roof. However, Building 2 is of modern construction, based in an extremely well-lit urban environment and subject to much disturbance. Additionally, there is a lack of connectivity to suitable foraging habitat. Because of this, Building 2 is considered to have Negligible potential to support roosting and hibernating bats

The trees on the application site were not found to contain any Potential Roosting Features (PRF) which could be utilised by roosting bats, and are therefore considered to have Negligible potential to support roosting and hibernating bats.

The application site contains limited habitat suitable to support foraging bats and is unlikely to function as a commuting corridor due to the lack of linear habitat and its urban context. Because of this, the application site is considered to have Negligible potential to support roosting and hibernating bats.

Based on the above, the application site is considered to be of Negligible importance for bats.

3.4.6 Otter

TVERC returned three records of otter *Lutra lutra* from within 1 km of the application site. Two records are associated with the River Thames to the north and one with the Kennet and Avon Canal. The application site does not offer suitable habitat for otter.

Based on the above, the application site is therefore considered to be of Negligible importance for otter.

3.4.7 Badger and Hedgehog

GiGL returned a single record of hedgehog *Erinaceus europaeus* and a single record of badger *Meles meles* within 1 km of the application site. However, the application site does not offer suitable habitat to support badgers or hedgehogs.

Based on the above, the application site is considered to be of Negligible importance for these species.

3.4.8 Invasive Species

TVERC returned records of species listed on Schedule 9 of the WCA within 1 km including Japanese knotweed *Fallopia japonica*.

No invasive species were identified on application site.

3.5 Target Notes

Target Note 1: A fenced off area at the south of Building 1 which could be viewed but not accessed (see Appendix 1).

3.6 Assessment of Importance of Ecological Features

Table 3.3 presents the ecological importance of habitats and species present on the application site, in accordance with CIEEM guidance. Species assessed as being unlikely to be present on the application site are not considered further in this assessment.

Table 3.2: Ecological Importance of Features Present on the application site (in accordance with CIEEM, 2018)		
Feature	Ecological Importance	Rationale
Buildings	Negligible	Does not contribute to biodiversity value of the application site.
Hard standing	Negligible	Does not contribute to biodiversity value of the application site.
Amenity grassland	Site Level	Contributes limited biodiversity value to the application site and provides potential habitat for common invertebrates.
Introduced Shrub	Site Level	Contributes to biodiversity value of the application site, and provides potential habitat for common invertebrates, birds and bats but value is unlikely to extend beyond the Site Level.
Scattered Trees	Site Level	Common in the local landscape and provides habitat potentially used by a range of species.
Bare Ground	Negligible	Does not contribute to biodiversity value of the application site.
Invertebrates	Site Level	The application site is likely to support a common assemblage of invertebrates.
Amphibians	Negligible	The application site is unlikely to support amphibians.
Reptiles	Negligible	The application site is not likely to support reptiles.
Birds	Site Level	The trees and introduced shrub present could provide foraging or nesting opportunities for a small number of common nesting birds.
Bats	Site Level	The application site is unlikely to support roosting bats and likely provides limited foraging and commuting opportunities.
Otters	Negligible	The application site is unlikely to support otters.
Hedgehog and Badgers	Negligible	The application site is unlikely to support hedgehogs and badgers.

4. ASSESSMENT OF POTENTIAL EFFECTS, MITIGATION MEASURES AND RESIDUAL EFFECTS

The proposed development would result in the removal of habitats of up to Site level ecological importance, with all existing buildings, hardstanding, introduced shrub and amenity grassland within the application site removed. Of the 18 scattered trees on the application site, a maximum of 15 would be removed to facilitate development, while three at the western edge are proposed to be retained as per advice provided in the Arboricultural Impact Assessment (AIA) produced by Tim Moya Associates.¹³.

4.1.1 Proposed landscaping

At least 10 % of the application site area would be provided as open space, which shall include, but not be limited to, hard and soft landscaping, public realm, and the provision of amenity spaces, including play space provision.

Landscape planting would be included as part of the proposed development. The following habitats are currently proposed as part of the illustrative landscaping strategy:

- Wildflower meadow;
- Podium gardens;
- Rain gardens;
- Shrub planting;
- Amenity lawn;
- Biodiverse roofs; and
- Tree planting.

The precise habitats, species mix, locations and areas of landscape planting would be confirmed at the detailed design stage.

4.2 Mitigation Measures and Enhancement

4.2.1 Embedded Mitigation

Habitats

The loss of habitats of up to Site level ecological importance would be mitigated through the inclusion of an appropriate planting scheme being bought forward at the detailed design stage, such as that detailed in 4.1.1, which would be secured by means of an appropriately worded planning condition.

Construction works in the vicinity of trees to be retained could damage overhanging branches or roots, possibly leading to significant adverse impacts upon the trees (potentially premature death). Therefore, retained trees would be protected during construction activities in accordance with BS 5837: 2012 ‘Trees in Relation to Design, Demolition and Construction’, in order to reduce the possibility of any damage, to both crown and roots of the trees.

Trees, shrubs and herbs of native species would be incorporated into soft landscaping and non-native species should be avoided to prevent introducing invasive species. Any invasive species identified during the demolition and planting process would be discarded and disposed of appropriately.

¹³ Tim Moya Associates, 2019. Arboricultural Impact Assessment Report – Reading Station Shopping Park. Report reference: 190314-PD-11

Invertebrates

The loss of habitat of Site importance would be addressed through the inclusion of a suitable planting scheme, which would provide high quality foraging habitat for invertebrates, for example through the inclusion of a wildflower meadow.

Birds

Works at the application site, including the removal of vegetation would take place between September and January inclusive. If this is not possible, a nesting bird check would be undertaken by an experienced ecologist prior to removal. If evidence of nesting birds is identified, work would stop and a suitable no-work buffer zone around the nest area should be installed, until such time as chicks have fledged. In addition, bird scarers could be installed across the application site including hawk eyes to help to prevent birds from nesting on the buildings on the application site, prior to demolition. Netting to prevent birds from nesting within trees and other vegetation would not be used.

Construction Environmental Management Plan (CEMP)

The proposed development would be subject to a CEMP, to include measures to reduce run-off, noise, lighting and dust impacts caused during the demolition and construction period, to avoid impacting designated sites, habitats and species on the sites and in the ZoI.

The CEMP would include the following:

- Pollution prevention measures to prevent work causing run-off, pollution or hydrological changes to habitats;
- Measures to ensure exposed excavations would be secured (with appropriate fencing), or provided with provision of mammal ladders and capping of pipework and services, at night time to prevent animals becoming trapped; and
- Measures to reduce construction impacts on bats and birds, such as appropriate timing of works and minimising night time lighting of the site.

Habitat Management Plan (HMP)

A Habitat Management Plan (HMP) would be developed to ensure that new and retained habitats are appropriately managed for biodiversity in the long term.

4.2.2 Enhancement

In order to comply with planning policy^{14,15} to achieve no net loss of biodiversity and provide a net gain, additional biodiversity enhancement measures could be introduced to the application site.

Enhancement for invertebrate species would be provided through provision of log piles, pebbles or insect boxes ('bug hotels') within the landscape planting.

The addition of insect loggeries would lead to an increase in the invertebrate assemblage while this in turn would provide foraging opportunities for bats.

A native wildflower seed mix could be applied to any areas of grassland within the landscape planting, to provide an additional foraging resource for pollinating bees and other insects.

The installation of bird and bat boxes built into buildings and on suitable retained mature trees around the perimeter of the application site would provide additional nesting and roosting opportunities respectively for these species groups.

¹⁴ Department for Communities and Local Government, 2019. National Planning Policy Framework (NPPF). London. HMSO
¹⁵ Defra, 2011. Natural Environment White Paper. The natural choice: securing the value of nature
<https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature>

The possibly of incorporating SuDS features into the application site would be investigated at detailed design. Options could include a swale and rain gardens. If incorporated, these features could provide valuable habitat for wetland plant species, aquatic invertebrates and potentially amphibians.

4.3 Assessment

This section describes the potential impacts arising from the proposed development, at both the demolition and construction stage and for the completed development stage. It considers the embedded mitigation, as well as enhancement commitments.

4.3.1 Demolition and Construction

Designated Sites

There are three designated sites within 1 km of the application site: Cow Lane Depot LWS, The Warren Woodlands Complex LWS, and The Coal, Kennetmouth and Kings Meadow East LWS.

No negative impacts are envisaged on these designated sites due to their distance from the application site. Mitigation for designated sites is therefore not required, and **no significant residual effects** on designated sites are expected during the demolition and construction phase.

Habitats

The proposed development would lead to the loss of the following habitat:

- Buildings and Hardstanding: Two buildings on the application site, as well as associated hardstanding totalling 17,069 m²;
- Amenity Grassland: Four areas totalling 708 m²;
- Introduced Shrub: Five small areas totalling 330 m²;
- Bareground: One area measuring 58 m²; and
- Scattered trees: 15 treto be removed.

Provision of new landscape planting would mitigate for the loss of habitat that would occur during the demolition and construction phase.

Indirect impacts on retained and adjacent off-site habitats has the potential to occur. This includes potential noise and contamination / pollution events, including dust and run-off, during the demolition and construction process.

However, with the implementation of the CEMP, **no significant residual effects** on habitats are expected during the demolition and construction stage.

Species

Invertebrates

Loss of vegetation would lead to loss of small areas of habitat suitable for use by common invertebrates, for which the application site is of Site level importance. Potential negative effects on invertebrates are unlikely to be significant beyond the Site Level.

Due to the temporary nature of these effects, **no significant residual effects** on invertebrates are expected to arise during the construction phase.

Birds

All wild birds are protected whilst nesting, with disturbance and destruction of active nests constituting an offence under the WCA. Loss of vegetation would remove suitable nesting habitat for breeding birds. Were this to take place during the breeding season (March to

August inclusive), there would be a risk that nests would be damaged or destroyed during the process. These negative effects have the potential to be significant at up to the Site Level.

With the implementation of mitigation, **no significant residual effects** on birds are expected during the construction phase.

Bats

The results of the inspection found no evidence of roosting bats. The application site is also considered to be of Negligible importance for foraging and commuting bats. **No significant residual effects** on bats are expected to arise during the construction phase.

4.3.2 Completed Development

Designated Sites

No negative impacts are envisaged on these designated sites due to their distance from the application site. Mitigation for designated sites is therefore not required, and **no significant residual effects** on designated sites are expected as a result of the completed development.

Habitats

The habitats currently present on the application site are of site level importance only. With the implementation of a suitable landscaping scheme, which incorporates a variety of good quality habitats of known value for wildlife; and the production of a HMP to ensure the appropriate management of the new and retained habitats; the residual effects of the proposed development on habitats are predicted to be **positive**, significant at the **Site level**.

Species

Invertebrates

Provision of landscape planting with known biodiversity value (including nectar-producing flowers) would be of benefit to invertebrate species using the application site, mitigating for this loss of habitat in the medium term, once new habitats become established.

For the completed proposed development, it is expected that the residual effects would be **positive**, significant at the **Site level**.

Birds

Provision of new landscape planting including trees, hedges and shrubs would provide replacement foraging and nesting habitat for use by common bird species.

With the implementation of mitigation, **no significant residual effects** on birds are expected for the completed development.

Bats

Following mitigation, it is expected that there would be a **positive residual effect**, significant at the **Site level** as a result of the completed development.

4.4 Monitoring

Due to the lack of residual effects that are expected, specific ecological monitoring is not considered necessary for the proposed development.

4.5 Recommendations for Further Survey

No further surveys are recommended at this time. However, further surveys or update surveys may become necessary in the future depending on when works commence on site.

Such surveys may include, but not be limited to, an updated extended Phase 1 habitat assessment.

5. CONCLUSIONS

The extended Phase 1 Habitat survey and external building and tree inspections for bats confirmed that the application site is of ecological importance at up to the Site level. By undertaking the work in accordance with the mitigation measures outlined in this report, the proposed development would be in conformity with relevant planning policy and legislation relating to ecology.

Following the implementation of the mitigation, no significant residual effects on biodiversity are expected at either the demolition or construction stage. Following completion of the proposed development, and with the implementation of the recommended enhancements; the proposed development would bring considerable benefits for biodiversity. It is anticipated that there would be a positive residual effects on habitats, significant at the Site level, and a positive residual effect on invertebrates and bats, significant at the Site level.

No additional mitigation is required over and above those embedded within the proposed development.

APPENDIX 1
FIGURES



Ecological features are protected under various United Kingdom (UK) and European legislative instruments. These are described below. European legislation is not included as it is incorporated in UK legislation by domestic provisions.

The Conservation of Habitats and Species Regulations, 2017, as amended

The Habitats Directive (Council Directive 92/43/EEC)¹⁶ came into force in 1992 and provides for the creation of a network of protected wildlife areas across the European Union, known as 'Natura 2000'. The Natura 2000 network consists of Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Birds Directive (Council Directive 79/409/EEC)¹⁷. These sites are part of a range of measures aimed at conserving important or threatened habitats and species.

The Conservation of Habitats and Species Regulations 2017¹⁸ commonly known as 'the Habitats Regulations' transposes the Habitats Directive into national law and set out the provisions for the protection and management of species and habitats of European importance, including Natura 2000 sites. The 2017 bill consolidated all previous versions of the regulations and subsequent amendments since initial transposition, bringing them all under the single heading, and made a number of minor amendments. It extends to England and Wales, and to a limited extent Scotland and Northern Ireland. In Scotland, the Habitats Directive is transposed through a combination of the Habitats Regulations 2017 (in relation to reserved matters) and the Conservation (Natural Habitats &c.) Regulations 1994. The Conservation (Natural Habitats, &c) Regulations (Northern Ireland) 1995 (as amended) transposes the Habitats Directive in relation to Northern Ireland.

In addition to providing for the designation and protection of Natura 2000 sites, the Habitats Regulations provide strict protection for plant and animal species as European Protected Species. Derogations from prohibitions are transposed into the Habitats Regulations by way of a licensing regime that allows an otherwise unlawful act to be carried out lawfully for specified reasons and providing certain conditions are met. Under the Habitats Regulations, competent authorities have a general duty, in the exercise of any of their functions, to have regard to the Habitats Directive and Wild Birds Directive including in the granting of consents or authorisations. They may not authorise a plan or project that may adversely affect the integrity of a European site, with certain exceptions (considerations of overriding public interest).

The Countryside and Rights of Way Act 2000

The Countryside and Rights of Way Act 2000¹⁹ primarily extends to England and Wales. It provides a new statutory right of access to the countryside and modernises the rights of way system, bringing into force stronger protection for both wildlife and countryside.

The Act is divided into five distinct sections, Part III is of relevance to ecology:

Part III - Nature Conservation and Wildlife Protection: The Act details a number of measures to promote and enhance wildlife conservation. These measures include improving protection for Sites of Special Scientific Interest (SSSIs) and increasing penalties for deliberate damage to SSSIs. Furthermore, the Act affords statutory protection to Ramsar Sites which are wetlands designated under the International Convention on Wetlands²⁰.

¹⁶ European Commission (1992) Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora.

European Commission, Brussels

¹⁷ European Commission (1979) Council Directive 79/409/EEC on the conservation of wild birds, European Commission, Brussels

¹⁸ Secretary of State (2017) The Conservation of Habitats and Species Regulations. Her Majesty's Stationery Office (HMSO)

¹⁹ Secretary of State (2000) The Countryside and Rights of Way Act. HMSO

²⁰ United Nations Educational, Scientific and Cultural Organization (UNESCO) (1971) Convention on Wetlands of International

Importance especially as Waterfowl Habitat, as amended in 1982 and 1987. Ramsar, Iran Published in Paris, 1994

Wildlife and Countryside Act 1981, as Amended in Quinquennial Review and by the Countryside and Rights of Way Act 2000 and the Natural Environment and Rural Communities Act 2006

The Wildlife and Countryside Act 1981²¹ forms the basis of much of the statutory wildlife protection in the UK. Part I deals with the protection of plants, birds and other animals and Part II deals with the designation of SSSIs.

This Act covers the following broad areas:

- Wildlife - listing endangered or rare species in need of protection and creating offences for killing, disturbing or injuring such species. Additionally, the disturbance of any nesting bird during breeding season is also noted as an offence, with further protection for species listed on Schedule 1. Measures for preventing the establishment of non-native plant and animal species as listed on Schedule 9 are also provided;
- Nature Conservation - protecting those Sites which are National Nature Reserves (NNR) and SSSI;
- Public Rights of Way - placing a duty on the local authority (normally the County Council) to maintain a definitive map of footpaths and rights of way. It also requires that landowners ensure that footpaths and rights of way are continually accessible; and
- Miscellaneous General Provisions.

The Act is enforced by Local Authorities.

Natural Environment and Rural Communities (NERC) Act 2006

Under the NERC Act 2006²² Section 40, public authorities must show regard for conserving biodiversity in all their actions. Public authorities should consider how wildlife or land may be affected in all the decisions that they make. The commitment to the biodiversity duty must be measured by public authorities.

NERC Act 2006 Section 41 requires the Secretary of State to publish a list of habitats and species that are of principal importance for the conservation of biodiversity in England.

Protection of Badgers Act 1992

The Protection of Badgers Act 1992²³ consolidated previous legislation relating specifically to badgers. This makes it an offence to kill, injure or take a badger, or to damage or interfere with a sett unless a licence is obtained from a statutory authority.

Biodiversity Action Plans

In 1994, Government produced the UK Biodiversity Action Plan (BAP)²⁴, a national strategy for the conservation of biodiversity. This led to the creation of the UK Biodiversity Steering Group, which has listed 1,150 Species Action Plans (SAPs) and 65Habitat Action Plans (HAPs). Regional and District/Borough BAPs apply the UK BAP at a local level.

From July 2012, the UK Post-2010 Biodiversity Framework²⁵ succeeds the UK BAP and Conserving Biodiversity - the UK Approach. This is as a result of a change in strategic thinking following the publication of the Convention on Biological Diversity's Strategic Plan for Biodiversity 2011 - 2020 and its 20 'Aichi targets', at Nagoya, Japan in October 2010, and the launch of the new EU Biodiversity Strategy (EUBS) in May 2011.

²¹ Secretary of State (1981) Wildlife and Countryside Act. HMSO

²² Natural Environment and Rural Communities Act 2006. HMSO

²³ Secretary of State (1992) Protection of Badgers Act 1992. HMSO

²⁴ Her Majesty's Stationery Office, 1994. Biodiversity: The UK Action Plan. London

²⁵ JNCC and Defra (on behalf of the Four Countries' Biodiversity Group), 2012. UK Post-2010 Biodiversity Framework. July 2012.

jncc.defra.gov.uk/pdf/UK_Post2010_Bio-Fwork.pdf

The UK Post-2010 Biodiversity Framework constitutes the UK’s response to these new ‘Aichi’ strategic goals and associated targets. The Framework recognises that most work which was previously carried out under the UK BAP is now focussed on the individual countries of the United Kingdom and Northern Ireland, and delivered through each countries’ own strategies.

Following the publication of the new Framework, the UK BAP partnership no longer operates. However, many of the tools and resources originally developed under the UK BAP remain of use. The UK list of priority species has been used to help draw up statutory lists of priorities in England, Scotland, Wales and Northern Ireland. For England, this is in line with the NERC Act 2006 Section 41.

Biodiversity in the Planning Process

Administrative and policy guidance on the application of some of these statutory obligations is provided through relevant government policy guidance and advice. In England, this includes National Planning Policy Framework 2012, National Planning Practice Guidance, Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System, Biodiversity 2020 and Natural Environment White Paper The natural choice: securing the value of nature.

National Planning Policy Framework, 2019

The National Planning Policy Framework (NPPF)²⁶ adopted in 2018 sets out the Government’s planning policies for England and how these are expected to be applied. The NPPF contains the following statements which are of relevance (not an exhaustive list, but including those of highest relevance):

- Section 15, paragraph 170 states that the planning system should contribute to and enhance the natural and local environment by: “minimising impacts on biodiversity and providing net gains in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”;
- Section 15, paragraph 174 states that planning applications should “promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity”.
- Section 15, paragraph 174 states that - “To protect and enhance biodiversity and geodiversity, planning policies [local authorities] should: identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity; wildlife corridors and stepping stones that connect them; and areas identified by national and local partnerships for habitat management, enhancement, restoration or creation”; and
- Section 15, paragraph 175 states that: “When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles: if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused”. It also states that: “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of ancient or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss and a suitable compensation strategy exists”.

²⁶ Department for Communities and Local Government (2018) National Planning Policy Framework (NPPF). London. HMSO

National Planning Practice Guidance, 2014

The National Planning Practice Guidance²⁷ is a web-based resource launched in March 2014. This guidance is divided into sections, of which Natural Environment: Biodiversity, Ecosystems and Green Infrastructure provides information on biodiversity issues within planning and guidance on where to find further information on biodiversity issues.

Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System.

This circular²⁸ provides administrative guidance on the application of the law relating to planning and nature conservation as it applies in England. It complements the national planning policy in the National Planning Policy Framework and the Planning Practice Guidance.

Natural Environment White Paper. The natural choice: securing the value of nature

The Natural Environment White Paper²⁹ outlines the government’s vision for the natural environment over the next 50 years, shifting the emphasis to an integrated landscape-scale approach. It describes the actions that will be taken to deliver that goal.

Biodiversity 2020

The Biodiversity 2020³⁰ strategy for England builds on the Natural Environment White Paper and provides a comprehensive picture of how England is implementing its international and EU commitments. It sets out the strategic direction for biodiversity policy on land (including rivers and lakes) and at sea.

The mission for this strategy is to halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife and people.

It is anticipated that this will be delivered through:

- a more integrated large-scale approach to conservation on land and at sea;
- putting people at the heart of biodiversity policy;
- reducing environmental pressures; and
- improving our knowledge.

Local Planning Policy

Reading Borough Local Plan (Adopted November 2019)

Policy EN12: BIODIVERSITY AND THE GREEN NETWORK

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.*

²⁷ Department for Communities and Local Government (2014) National Planning Practice Guidance: <http://planningguidance.planningportal.gov.uk/>

²⁸ Office of the Deputy Prime Minister (2005) Circular 06/2005: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System. <https://www.gov.uk/government/publications/biodiversity-and-geological-conservation-circular-06-2005>

²⁹ Defra (2011) Natural Environment White Paper. The natural choice: securing the value of nature <https://www.gov.uk/government/publications/the-natural-choice-securing-the-value-of-nature>

³⁰ Defra, 2011. Biodiversity 2020. <https://www.gov.uk/government/publications/biodiversity-2020-a-strategy-for-england-s-wildlife-and-ecosystem-services>

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.

EN14: TREES, HEDGES AND WOODLANDS

"Individual trees, groups of trees, hedges and woodlands will be protected from damage or removal where they are of importance, and Reading's vegetation cover will be extended. The quality of waterside vegetation will be maintained or enhanced. New development shall make provision for tree retention and planting within the application site, particularly on the street frontage, or off-site in appropriate situations, to improve the level of tree coverage within the Borough, to maintain and enhance the character and appearance of the area in which a site is located, to provide for biodiversity and to contribute to measures to reduce carbon and adapt to climate change. Measures must be in place to ensure that these trees are adequately maintained".

Reading Biodiversity Action Plan

The Reading Biodiversity Action Plan sets out a methodology to protect, conserve and enhance Reading's diversity of wildlife.

**APPENDIX 3
SITE PHOTOGRAPHS**



Photo 1. Building 1 (background) and hard standing (foreground)



Photo 2. Building 1 (background) and hard standing (foreground)

Title: Photographs of Application Site	Client: Aviva Investors
Site: Reading Station Shopping Park	Date: 03/04/2019



Photo 3. Building 2 (background) and hard standing (foreground)



Photo 4. Introduced shrub and scattered trees to the west of Building 2

Title: Photographs of Application Site	Client: Aviva Investors
Site: Reading Station Shopping Park	Date: 03/04/2019



Photo 5. Amenity grassland and introduced shrub at northern boundary



Photo 6. Rear of Building 1, marked as TN1 on Appendix 1, Figure 1

Title: Photographs of Application Site	Client: Aviva Investors
Site: Reading Station Shopping Park	Date: 03/04/2019