



Station Hill, Reading

Bat Survey Report

September 2018

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Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS OHSAS 18001:2007)

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Comments

Disclaimer

This report has been prepared by Waterman Infrastructure & Environment Limited, with all reasonable skill, care and diligence within the terms of the Contract with the client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

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1. Introduction

- 1.1. Waterman Infrastructure & Environment Ltd (Waterman IE) was commissioned by SH Reading Master LLP (hereafter referred to as the 'Applicant') to carry out a bat survey at an area of land known as Station Hill, which encompasses Plots A - G, located in Reading Town Centre (hereafter referred to as the 'Site'). The bat survey however was specific to a building within Plot F (B3) and a building (B7) adjacent to the south of this plot.

The Site

- 1.2. The Site is approximately 2.53 hectares (ha) in area and is centred on Ordnance Survey Grid Reference SU 71351 73699.
- 1.3. The recent Preliminary Ecological Appraisal (PEA) (report ref: WIE14788-100-R-1-2-1-PEA) identified the following habitats on Site: buildings (B1 – B6), hardstanding, ephemeral / short perennial, ornamental planting, scattered trees and walls/fences (**Figure 1**).
- 1.4. The Site is bound by roads/built development on all sides, notably Station Hill to the north, Thames Tower and Merchants Place to the east, Friar Street to the south and Greyfriars Road and built retail/office/residential development (Sainsburys, Central Studios and Greyfriars House) to the west.

Development Proposals

- 1.5. The planning history of the Site and Development proposals are summarised in the recent PEA report, however, this report has been prepared specifically in support of a prior notification of demolition submission by the Applicant in relation to Friars Walk Shopping Centre (B3) and Telecom House (B4) (hereafter referred to as the 'Development') which occupy Plot F and Plot E of the overall Development.

Aims and Objectives of this Assessment

- 1.6. The recent PEA identified B3 and B7 as having low potential to support roosting bats. B3 will be demolished as part of the Development and therefore a further bat survey was recommended in the PEA to determine the presence / likely absence of roosting bats in this building. Although building B7 will not be demolished as part of the Development, it is considered that it could be disturbed due to the proposed demolition works at the attached B3, and therefore a further bat survey was also undertaken at this building.
- 1.7. The findings of the bat surveys are presented in this report, together with mitigation and enhancement measures where required, in line with current planning policy and legislative requirements (**Appendix A**).

2. Relevant Legislation and Planning Policy

Legislation

Bats

- 2.1. All bat species in England are protected by The Conservation of Habitats and Species Regulations 2017¹ and by the Wildlife and Countryside Act 1981 (as amended)². Taken together, it is an offence to:
- Deliberately kill, injure or capture a bat;
 - Deliberately disturb bats in such a way as to be likely to significantly affect:
 - (i) The ability of any significant group of bats to survive, breed, or rear / nurture their young; or
 - (ii) The local distribution of that species;
 - Damage or destroy any breeding or resting place used by bats; or
 - Intentionally or recklessly obstruct access to any place used by bats for shelter or protection.

National Planning Policy

National Planning Policy Framework, 2018

- 2.2. The National Planning Policy Framework³ (NPPF) was published in July 2018. Section 15 (outlined below) of the NPPF, 'Conserving and Enhancing the Natural Environment', replaces Section 11 of the previous NPPF 2012 revision⁴. However, Government Circular 06/2005⁵ - Biodiversity and Geological Conservation: Statutory Obligations and Their Impact within the Planning System, remains valid and is referenced within the NPPF.
- 2.3. The NPPF encourages the planning system to contribute to and enhance the natural and local environment. This should be achieved by:
- *"Protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
 - *recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
 - *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
 - *minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
 - *preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental*

¹ HMSO, 2017 'The Conservation of Habitats and Species Regulations'

² HMSO, 1981 'The Wildlife and Countryside Act' (WCA) (as amended)

³ Ministry of Housing, Communities and Local Government. (2018). *National Planning Policy Framework*.

⁴ Department of Communities and Local Government. (2012). *National Planning Policy Framework*.

⁵ Department of Communities and Local Government. (2005). *Circular 06/05: Biodiversity and Geological Conservation – Statutory Obligations and their Impact within the Planning System*.

conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

- *Remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate”.*

2.4. The NPPF also stipulates that Local Planning Authorities (LPAs), when determining planning applications, should apply the following principles:

- *“If significant harm to biodiversity 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;*
- *development on land within or outside a Site of Special Scientific Interest, and which is likely to have an adverse effect on it (either individually or in combination with other developments), should not normally be permitted. The only exception is where the benefits of the development in the location proposed clearly outweigh both its likely impact on the features of the site that make it of special scientific interest, and any broader impacts on the national network of Sites of Special Scientific Interest;*
- *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.”*

National Planning Practice Guidance, 2016

2.5. The Government’s Planning Practice Guidance⁶ (PPG) is intended to provide guidance to local planning authorities and developers on the implementation of the planning policies set out within the NPPF. The guidance of most relevance to ecology and biodiversity is the Natural Environment Chapter, which explains key issues in implementing policy to protect biodiversity, including local requirements.

Local Planning Policy

Reading Borough Local Development Framework: Core Strategy

2.6. The Core Strategy⁷ was adopted (with alterations) by Reading Borough Council on 27th January 2015. The Core Strategy is the main document in the Council’s Local Development Framework (LDF). It sets out how planning and development will achieve the Reading 2020 Vision for the town. It provides a framework for how Reading can grow in a sustainable way in the future. The following policy is of relevance to the Site:

- Policy CS36 ‘Biodiversity and Geology’ states:

⁶ Department for Communities and Local Government. (2016). *Planning Practice Guidance*. DCLG, London.

⁷ Reading Borough Council (January 2015). *Reading Borough Local Development Framework: Core Strategy*.

“a) Development should retain, protect and incorporate features of biodiversity or geological interest (including protected species and their habitats) found within the application site into their schemes. On sites with recognised biodiversity or geological value, development will not be permitted where there would be a direct or indirect adverse impact on the site, unless it can be clearly demonstrated that: -

- i. The need for development clearly outweighs the need to protect the value of the site; and
- ii. Appropriate compensation, impact minimisation, mitigation and compensation are provided.

b) Local Nature Reserves and Wildlife Heritage Sites will be safeguarded and where possible, enhanced. Permission will not be granted for any development that would adversely affect a designated nature reserve or Wildlife Heritage Site.

c) Any development that would sever or threaten the integrity of an established wildlife link, as indicated on an adopted proposals map, will not be permitted. Where applicable, developments should be designed to protect, consolidate, extend and enhance the network of wildlife links and corridors in and adjoining the Borough, working with neighbouring authorities where appropriate.”

[Reading Borough Local Development Framework, Sites and Detailed Policies Document, Adopted 2012 \(Updated 2015\)](#)

- 2.7. Policy DM3 of the Sites and Detailed Policies Document⁸ relates to infrastructure Planning. The policy states that in determining planning applications the highest priority will be given to *“open space, green infrastructure and other measures to improve or enhance biodiversity”*.

[Reading Borough Local Development Framework, Reading Central Area Action Plan, 2009](#)

- 2.8. The Reading Central Area Action Plan (RCAAP) adopted in 2009⁹, stresses that the design and construction of new developments in the centre of Reading should be sustainable in nature. The Plan draws attention to the use of green and brown roofs which *“may enhance the biodiversity value of developments in the centre. Brown roofs in particular are of benefit to species such as black redstarts, one of the priority species in the [Reading] Biodiversity Action Plan, which have been sighted in the central area”*.

[Station Hill South Planning and Urban Design Brief, 2007](#)

- 2.9. The Station Hill Planning and Urban Design Brief¹⁰ acknowledges that the ecology of the area is mainly limited to black redstarts, which are known to nest in the area. Design principle 8 states:
- *“Developments should demonstrate positive yield in terms of environmental and ecological benefits...”*;

⁸ Reading Borough Council (2012). *Reading Borough Local Development Framework, Sites and Detailed Policies Document, Adopted 2012*

⁹ Reading Borough Council (2009). *Reading Borough Local Development Framework: Reading Central Area Action Plan To 2026*.

¹⁰ Reading Borough Council (2007). *Station Hill South Planning and Urban Design Brief*.

- *“Development should meet the requirements of the local Biodiversity Action Plan (BAP)”;* and
- *“Building tall buildings can also yield potential ecological and environmental benefits by integrating vertical landscaping, roof gardens or vegetation within the architecture. Further consideration will be expected as part of any application for taller buildings.”*

Reading Borough Council: Tree Strategy for Reading

2.10. The Tree Strategy for Reading¹¹ sets out a shared vision and strategy for trees in Reading. It considers various issues and options in relation to trees and sets out a strategic approach towards future management. The following objectives are of relevance to this report:

2.11. Objective 5: Enhancing biodiversity states:

“The Council will seek to ensure that the management of its tree stock and woodlands is enhanced by:

- *Protecting trees and woodlands, particularly ancient or veteran trees and important woodlands;*
- *Writing and implementing woodland management plans;*
- *Conserving, enhancing and extending existing green corridors and creating new ones to enhance the borough’s green infrastructure;*
- *Ensuring that native and wildlife friendly species of trees are used in new planting schemes in most cases; and*
- *Retaining standing and fallen dead wood habitat for biodiversity where health and safety and amenity considerations allow.”*

2.12. Objective 6: The role of new developments states:

“New development will be expected to make a positive and sustainable contribution supporting the objectives of this strategy in enhancing Reading’s urban environment. Such planting should be used to enhance streets and other public realm as part of planning permissions for all relevant new developments, particularly in higher density urban developments.”

Reading Local Plan 2018

2.13. Reading Borough Council are currently producing a new Local Plan¹², which once adopted will replace the existing development plans detailed above. The new Local Plan was submitted to the Secretary of State for examination on Thursday 29th March 2018. The following policies relate to the Site and/or biodiversity and nature conservation:

- EN12: Biodiversity and The Green Network; and
- CR11: Station / River Major Opportunity Area
 - CR11a: Friar Street & Station Road;
 - CR11b: Greyfriars Road Corner;
 - CR11c: Station Hill & Friars Walk.

¹¹ Reading Borough Council (June 2010). *Tree Strategy for Reading*.

¹² Reading Borough Council (2018) *Submission Draft: Reading Borough Local Plan*.

Guidance

Biodiversity 2020: A strategy for England's wildlife and ecosystem services

- 2.14. In October 2010, over 190 countries signed an historic global agreement in Nagoya, Japan to take urgent and effective action to halt the alarming global declines in biodiversity. This agreement recognised just how important it is to look after the natural world. It established a new global vision for biodiversity, including a set of strategic goals and targets to drive action. England's response to this agreement was the publication of '*Biodiversity 2020: A strategy for England's wildlife and ecosystem services*'¹³. 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."

BS 42020: 2013 Biodiversity: Code of Practice for Planning and Development

- 2.15. The UK commitment to halt overall loss of biodiversity by 2020 in line with the European Biodiversity Strategy and UN Aichi targets¹⁴, is passed down to local authorities to implement, mainly through planning policy. To assist organizations affected by these commitments, BSI has published BS 42020 which offers a coherent methodology for biodiversity management.
- 2.16. This British Standard sets out to assist those concerned with ecological issues as they arise through the planning process in matters relating to permitted development and activities involved in the management of land outside the scope of land use planning, which could have site-specific ecological implications.
- 2.17. The standard has been produced with input from a number of organisations including the Chartered Institute of Ecology and Environmental Management (CIEEM) and the Association of Local Government Ecologists (ALGE) and provides:
- Guidance on how to produce clear and concise ecological information to accompany planning applications;
 - recommendations on professional ethics, conduct, competence and judgement to give confidence that proposals for biodiversity conservation, and consequent decisions/actions taken, are sound and appropriate; and
 - direction on effective decision-making in biodiversity management a framework to demonstrate how biodiversity has been managed during the development process to minimize impact.

¹³ Defra. (2011) *Biodiversity 2020: A strategy for England's wildlife and ecosystem services*.

¹⁴ <https://www.cbd.int/sp/targets/>

3. Methodology

- 3.1. To confirm the presence or absence of roosting bats within B3 and B7, an evening emergence bat survey was undertaken based on current best practice guidelines¹⁵.
- 3.2. Three bat surveyors were used during the surveys to ensure all of the potential bat access features were covered. The surveys were led by an ecologist who holds a Natural England Class 2 Bat Survey Licence for all counties and species in England. The positions of the surveyors during the evening emergence survey are presented on **Figure 2**.
- 3.3. The surveys were undertaken using Batlogger M bat detectors. This survey equipment is considered suitable for detecting all resident species of UK bats.
- 3.4. The surveys were undertaken in appropriate weather conditions and within the recognised bat active season (May to August) for these types of surveys. **Table 1** below provides a summary of the bat surveys undertaken.

Table 1: Summary of Evening Emergence Bat Survey

Date	Dusk Time	Time start / end (GMT+1)	Start Weather conditions	Temp at start	Temp at end
08.05.18	20:40	20:25-22:12	BF2*, cloud cover 6/8 Oktas**	22°C	18°C

*Beaufort Scale (0-12)

**Oktas cloud cover scale (0-8)

- 3.5. Recorded bat calls were later analysed using appropriate sound analysis reference publications where appropriate using BatSound 4.1.2b.
- 3.6. Any bats observed were recorded. Information, where relevant, included:
 - Time;
 - Emergence or re-entry points;
 - Direction of flight;
 - Use of landscape;
 - Flight characteristics;
 - Size;
 - Height; and
 - Behaviour.

¹⁵ Collins. J (2016) *Bat Survey for Professional Ecologists: Good Practice Guidelines*. 3rd Edition.

4. Results

- 4.1. No bats were observed emerging or entering building B3 or B7 during the evening emergence survey. Common pipistrelle *Pipistrellus pipistrellus* passes were recorded between 20:54 and 22:12 by the bat surveyors and further details are provided below:
- Surveyor 1 recorded four common pipistrelle passes at 21:02, 21:24, 21:56 and 22:12, however these bats were not seen;
 - Surveyor 2 recorded twenty-one common pipistrelle passes at 20:54, 20:57, 21:00, 21:01, 21:02, 21:04, 21:08, 21:20, 21:21, 21:22, 21:35, 21:43, 21:44, 21:45, 21:46, 21:47, 21:54, 22:00, 22:02, 22:07 and 22:09. The bats recorded at 20:54, 20:57, 21:00, 21:01, 21:02 and 21:08 were observed passing west to east and east to west over B7. All other bat recordings were heard but not seen; and
 - Surveyor 3 recorded twenty-six common pipistrelle passes at 20:54, 20:55, 20:58, 21:01, 21:02, 21:05, 21:08, 21:10, 21:19, 21:20, 21:21, 21:22, 21:23, 21:24, 21:25, 21:35, 21:43, 21:44, 21:45, 21:46, 21:47, 21:56, 21:58, 22:01, 22:02 and 22:07. Activity recorded was similar to Surveyor 2, with the exception that foraging activity was recorded at 21:01, 21:19, 21:47 and 22:02 to the west of B7.
- 4.2. Based on the bat surveyor observations it is considered that a small number of common pipistrelle bats (1-23 individuals) were recorded at the Site. Common pipistrelle is considered to be the most common and widespread bat species in England (population over 100,000)¹⁶. The average roost emergence time for common pipistrelle is 24.8 minutes after sunset¹⁷. Given that the first bat was recorded fourteen minutes after to sunset, it is considered likely that this bat is roosting near the Site.
- 4.3. Given that no bats were recorded emerging or entering B3 or B7, it is considered unlikely that B3 or B7 would support roosting bats and therefore these buildings are currently of **negligible** value to roosting bats.

¹⁶ Wray, S., Wells, D., Long, E., Mitchell-Jones, T. (2010): 'Valuing Bats in Ecological Impact Assessment', IEEM In-Practice

¹⁷ Andrews Ecology (2017) A review of empirical data in respect of emergence and return times reported for the UK's 17 native bat species.

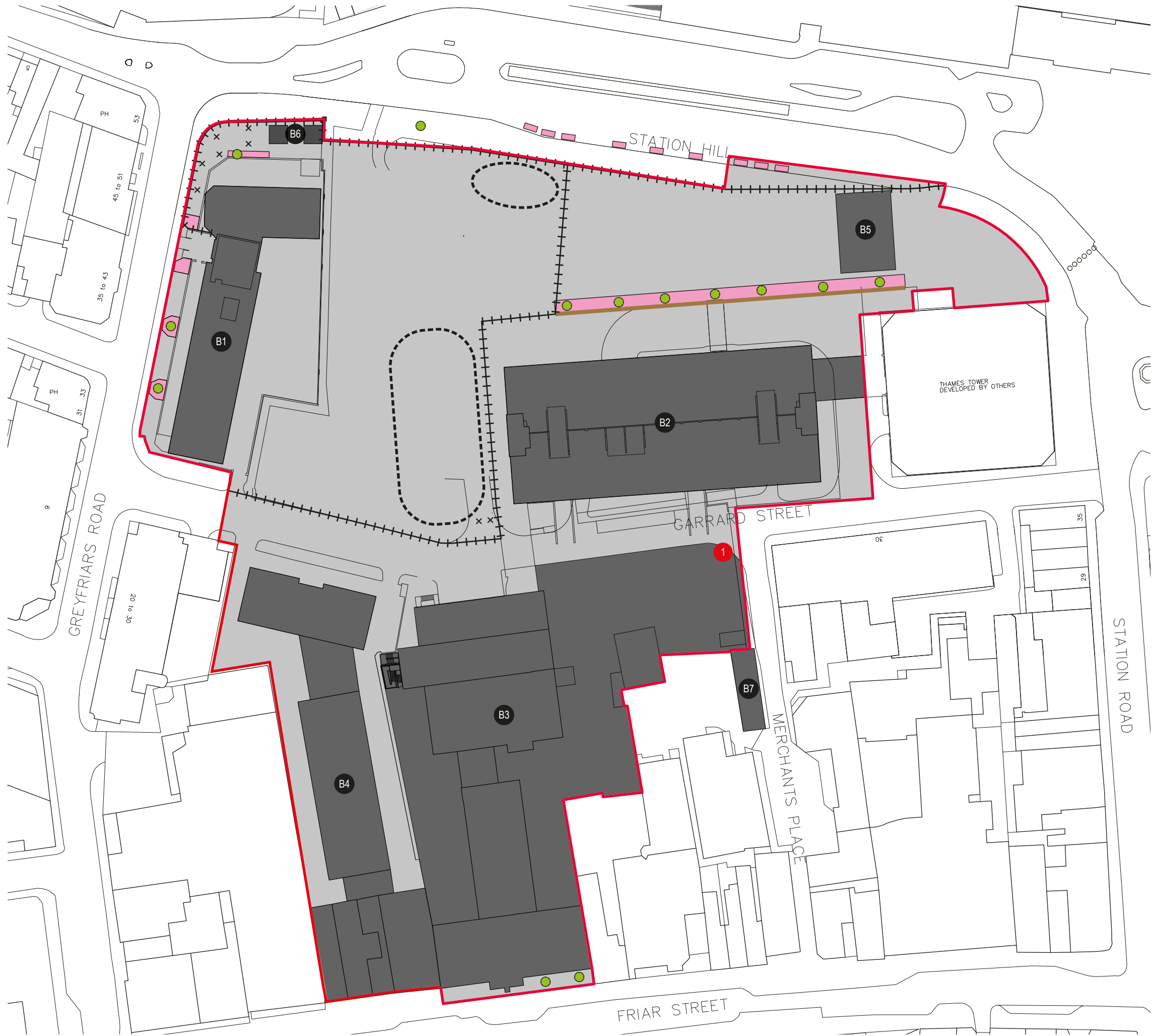
5. Conclusions and Recommendations

- 5.1. No evidence of roosting bats was recorded during the surveys of building B3 or B7. It is therefore assessed that the proposed demolition of B3 as part of the Development would not have any impacts on roosting bats either at B3 or the adjacent B7.
- 5.2. All other built structures and trees on Site have been identified as having **negligible** potential to support roosting bats. As such, no further assessment of these buildings/trees is required prior to any demolition works as part of the Development.
- 5.3. In line with Outline Planning Condition 30, if a significant period of time elapses (normally considered by most local planning authorities as being over 2 years) between this report being produced and the proposed Development works being undertaken, the buildings may deteriorate in condition and should be subject to an update survey to determine if their potential to support roosting bats has changed.
- 5.4. In line with local planning policy CS36, it is recommended that the future development provides bat boxes to enhance opportunities on Site for roosting bats. The bat boxes should be erected at least 4m above ground level facing south, south-east or south-west, be positioned in proximity to vegetated habitats and not lit by artificial lighting. The exact details of the bat box locations and models will be finalised by an ecologist in liaison with the architect / project team during the detailed design of the future development. The use of native plant species within the future development's landscape design would provide additional foraging and commuting habitat for bats at the Site.

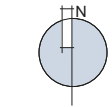
FIGURES

Figure 1: 'Extended' Phase 1 Habitat Survey Plan (WIE14788-100_GR_PEA_1A)

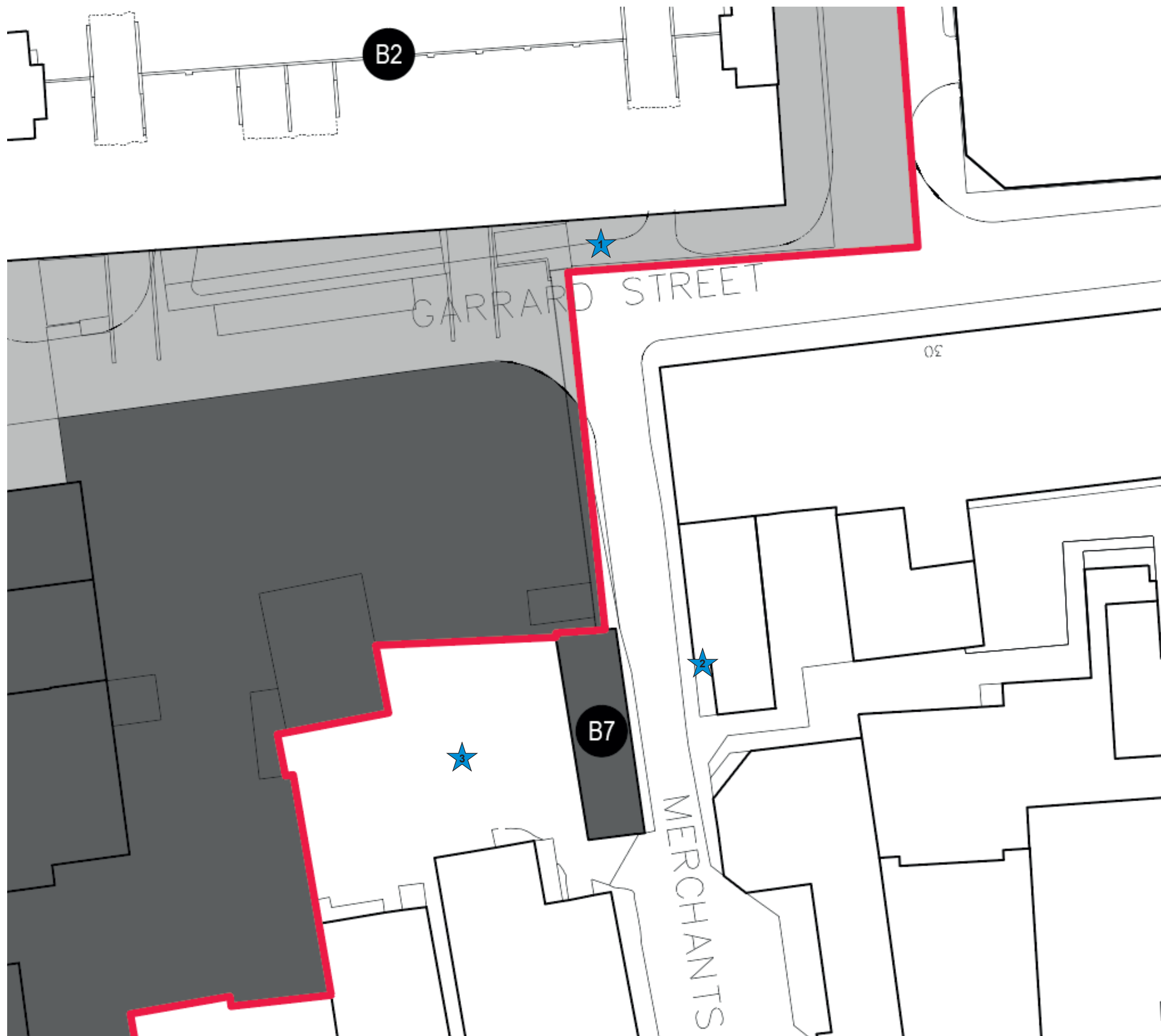
Figure 2: Bat Surveyor Locations (WIE14788-100_GR_EC_1A)



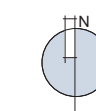
- Site Boundary
- Buildings
- Hardstanding
- Tree
- Ornamental Planting
- Ephemeral / Short Perennial
- Wall
- Aggregate Stockpiles
- Fence
- Target Note



Project Details	WIE14788-100: Station Hill, Reading
Figure Title	Figure 1: 'Extended' Phase 1 Habitat Survey Plan
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-  Site Boundary
-  Buildings
-  Hardstanding
-  Bat Surveyor Locations



Project Details	WIE14788-100: Station Hill, Reading
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UK and Ireland Office Locations

