

08 June 2018  
Our Ref: 3517\_02

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## BY EMAIL

Dear Mary

### Bristol & West Arcade Market Place Reading RG1 1JL – Bat Emergence Survey

Please find set out herein the findings of a Bat Emergence Survey undertaken at the above Site on 21 May 2018. In summary:

- Three individual roosting bats (common pipistrelle *Pipistrellus pipistrellus*) were observed to emerge from the roof of 29-31 Market Place during the survey;
- Avoidance and Mitigation measures will be required to avoid impacts and prevent legal offences. These measures can be readily delivered as part of the proposed scheme and secured via an appropriate licencing regime;
- Two further dusk emergence/dawn re-entry bat surveys of this building in the appropriate season (May to August inclusive) will be undertaken as per the 2016 Bat Conservation Trust guidelines to 'characterise' the roost types present, identify any further 'transitional' roosts and inform a licence application to Natural England;

## Proposals

Demolition of vacant former Bristol & West Arcade (173–175 Friar Street) and redevelopment of site to provide an eight storey mixed-use building plus one level of basement comprising 35 residential units, 4,212 sqm of B1 office floor space, and 5 retail units (A1/A2/A3), together with the change of use of 27-28 Market Place at first, second and third floors and basement to provide 2 residential units, change of use of 29-31 Market Place at first, second and third floors to provide 3 residential units, change of use of 32 Market Place from A2 use to provide part basement and ground floor flexible retail use (A1/A2/A3) and 3 residential uses at first, second and third floors, retention of 260.4sqm of A4 use at ground and basement floors at 29-31 Market Place and change of use at ground and basement of 27-28 Market Place to flexible retail use (A1/A2/A3) and demolition of rear parts of 29–31 Market Place and 32 Market Place, associated internal and external works to the Listed Buildings, landscaping, refuse, plant, cycle stores and substation at basement level.

## **Legislation**

All British bats are classed as European Protected Species and therefore receive protection under the Conservation of Habitats and Species Regulations 2010 (as amended), making it an offence to:

- Deliberately kill, injure or capture a bat;
- Deliberately disturb bats, including in particular any disturbance which is likely to impair their ability to survive, to reproduce or to rear or nurture their young, or their ability to hibernate or migrate, or which is likely to affect significantly their local distribution or abundance;
- Damage or destroy a breeding site or resting place of a bat.

In addition, all British bats are also listed under Schedule 5 of the Wildlife and Countryside Act 1981 (as amended) which contains further provisions making it an offence to intentionally or recklessly:

- Obstruct access to any structure or place which any bat uses for shelter or protection; or
- Disturb bats while occupying a structure or place that it uses for that purpose.

If proposed development work is likely to result in an offence a licence will need to be obtained from Natural England which would be subject to appropriate measures to safeguard bats.

There are at least 17 breeding bat species in Britain. Many of them are considered threatened due to a variety of factors including habitat loss and disturbance/damage to roosts. Of these 17 species, a number regularly use buildings and trees as roost sites.

## **Method**

A single dusk emergence survey was undertaken to confirm the presence/likely absence of roosting bats in association with 27-32 Market Place.

The positions of the surveyors around the building during the survey are illustrated on the Dusk Emergence Survey Plan in Appendix A.

The dusk emergence survey commenced c. 15 minutes before British Summer Time (BST) sunset and continued for approximately 1.5 hours following sunset, with due consideration for the BCT good practice guidelines. The survey was carried out by Jamie Woollam CEcol MCIEEM 2015-10908-CLS-CLS and Tom Clemence ACIEEM 2017-28795-CLS-CLS in suitable weather conditions, as summarised in the table in Appendix B.

During the survey, the surveyor(s) watched for any bats emerging from parts of the building or using key flight lines, equipped with hand-held BatLogger M detectors. A note was made of all bat passes, along with the time, species and any information regarding behaviour, including direction of flight, and activity e.g. foraging/commuting.

## Results

### Context

The Site is located in the centre of Reading, around central grid reference SU 71670 73504. It comprises a complex of buildings previously used as retail and office units. A preliminary roost assessment (PRA) was undertaken on 01 and 14 November 2017 by Alexandra Cole ACIEEM 2016-25563-CLS-CLS and Tom Clemence ACIEEM 2017-28795-CLS-CLS. 173-175 Friar Street was determined to have 'Negligible' potential to support roosting bats and 27-32 Market Place as 'Low' given the presence of features suitable for individual crevice dwelling bats, such as slipped/missing tiles and weatherboarding.

A search of the of the Multi-Agency Geographic Information for the Countryside (MAGIC) online database undertaken in June 2018 identified a single nearby EPS mitigation licence (Ref: EPSM2013-6155) allowing destruction of a resting place utilised by common pipistrelle.

### Dusk Emergence Survey

A total of three common pipistrelle bats were identified emerging from the roof of 29-31 Market Place during the dusk emergence survey. The first was observed by the surveyor in location A and emerged from the apex of the roof. The second and third bats to emerge were located under tiles on a dormer to the rear of the roof. A fourth bat flew from the direction of the roof of 29-31 Market Place but emergence was not confirmed. Moderate levels of foraging activity were recorded by both surveyors throughout the survey, indicating bats are present within the surrounding area.

Constant, low levels of foraging common pipistrelle bats were observed during the survey associated with sheltered courtyards to the north and around street lights.

## Discussion

The current proposed works would not result in the loss of the three identified roosts. However, the works do have the potential to disturb bats within these roosts and as such avoidance/mitigation measures will be required. Once the permissions are obtained and subject to working methods and timings, a European Protected Species licence (or registration of the site under the 'Bat Low Impact Class Licence' (BLICL) scheme) may be necessary to avoid offences being caused.

To inform the final details of mitigation, and any licensing decisions taken, two further surveys will be undertaken between June and August (inclusive) to characterise the roosts identified, as well as to recorded any further transitional roosts which may be present within the roof and have not yet been identified.

The importance of the roosts cannot be fully determined before all survey work has been completed. However, to date, the roosts identified would all be classified as of 'Local' importance in line with Wray *et al.* (2010) which provides guidance on assessing the conservation value of bat roosts according to type and species<sup>1</sup>. There is no indication that roosts of greater importance (e.g. maternity roosts, or those of rarer species) are present.

A full impact assessment and mitigation strategy will be required once the surveys are complete. However, set out below are the anticipated avoidance and mitigation measures that would be required for the scheme (undertaken under an appropriate licensing regime, where applicable):

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<sup>1</sup> Wray *et al.*, 2010. Valuing bats in ecological impact assessment. *In Practice - Bulletin of the Chartered Institute of Ecology and Environmental Management*, 70, pp.23-25.

- Precautionary working methods during works, including timing of most sensitive works outside of key summer maternity roosting (May-August) and winter hibernation (November-February) seasons;
- Supervision of any sensitive works (such as re-roofing or works adjacent to roost);
- Provision of alternative roosting features (e.g. bat boxes and/or bat access tiles) within the roof of the building;
- Any new lighting scheme for the site will be designed to avoid illumination of any identified roosts or new bat roosting boxes/access tiles.

Based on the implementation of the above measures undertaken under a suitable licensing regime (where necessary) and subject to the findings of the remaining two further surveys, it is anticipated that the proposed scheme can be undertaken without significant adverse effects to bats, and avoidance of any legal offences under legislation which protects these species.

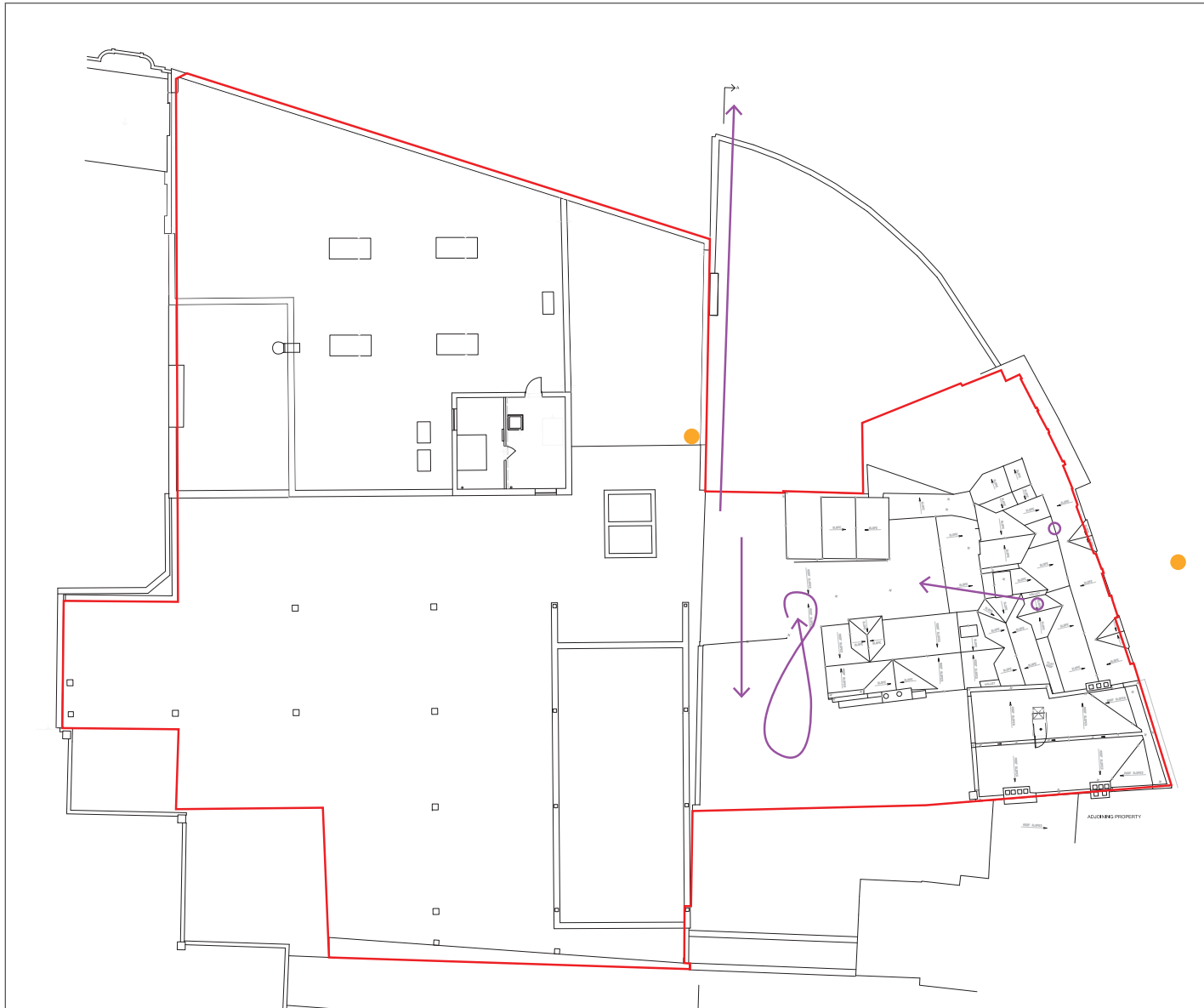
Yours sincerely,

A handwritten signature in black ink that reads "A. Cole". The signature is written in a cursive, slightly stylized font.

Alexandra Cole BSc (Hons) MSc ACIEEM  
**Senior Ecologist**

## **Appendix A**

### Dusk Emergence Survey Plan



-  Redline boundary
-  Surveyor location
-  Location of bat emergence (common pipistrelle)
-  Approximate route of bat



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**Project** 173-175 Friar St & 27-32 Market Place, Reading

**Drawing Title** Dusk Emergence Survey Plan

**Client** Savills

**Date** June 2018

**Scale** Not to scale

**Drawn** AC

**Drawing No.** CSA/3517/100

**Rev** -

**Checked** JW

## **Appendix B**

### Results Tables

# Weather Conditions

| Survey Date (2018) | Sunset | Survey Duration | Temp (°C) | Rain    | Cloud Cover (oktas; n/8) | Wind (Beaufort Scale) |
|--------------------|--------|-----------------|-----------|---------|--------------------------|-----------------------|
|                    |        |                 | Start/End |         | Start/End                | Start/End             |
| 21 May             | 20:57  | 20:42 – 22:27   | 22/22     | No rain | 1/6                      | 1/1                   |

## Dusk Emergence Survey (21 May 2018)

| Time Activity Recorded |       | Sunset      | 20:27                                                                                                                                                                                         |
|------------------------|-------|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Start                  | End   | Species     | Bat Behaviour (and surveyor position)                                                                                                                                                         |
| 20:42                  | 20:59 | -           | -                                                                                                                                                                                             |
| 21:00                  | 21:10 | Common pip. | <b>A Common pipistrelle emerged from apex of 29-31 Market Place (21:00).</b>                                                                                                                  |
| 21:11                  | 21:20 | Common pip. | <b>A</b> HNS (21:18)<br><b>B</b> Continuous foraging by individual bats (21:19-21:20)                                                                                                         |
| 21:21                  | 21:30 | Common pip. | <b>B 2 No. common pipistrelle emergence from roof of 29-31 Market Place (21:21)</b><br><b>B</b> Bat flew from direction of building (21:26)<br><b>B</b> Potential albino bat observed (21:29) |
| 21:31                  | 21:40 | Common pip. | <b>B</b> Foraging for approx. 2 minutes (21:31)<br><b>A</b> Bat flew across road (21:40)<br><b>B</b> Continuous foraging by individual bats (21:39-21:40)                                     |
| 21:41                  | 21:50 | Common pip. | <b>B</b> Continuous foraging by individual bats (21:41-21:43 & 21:46 - 21:50)                                                                                                                 |
| 21:51                  | 22:00 | Common pip. | <b>B</b> Continuous foraging by individual bats (21:51-21:54)<br><b>A</b> Foraging around lights above surveyor (21:54)<br><b>B</b> HNS (21:57)<br><b>B</b> HNS (21:58)                       |
| 22:01                  | 22:10 | Common pip. | <b>B</b> Continuous foraging by individual bats (22:04-22:10)<br><b>A</b> Brief pass (22:08)                                                                                                  |
| 22:11                  | 22:20 | Common pip. | <b>B</b> Continuous foraging by individual bats (22:11-22:20)<br><b>A</b> HNS, no activity after 22:12                                                                                        |
| 22:21                  | 22:27 | Common pip. | <b>B</b> Continuous foraging by individual bats (22:21-22:27)                                                                                                                                 |

Abbreviations: pip. = pipistrelle, HNS = heard, not seen.