

NO.1 READING, 29-35 STATION ROAD, READING

ECOLOGICAL IMPACT ASSESSMENT

Final Document

October 2018

Preliminary Ecological Appraisals • Protected Species Surveys and Licensing • NVC • EclA • Management Plans
Habitats • Badger • Bats • Hazel Dormouse • Birds • Reptiles • Amphibians • Invertebrates • Riparian and Aquatic Species

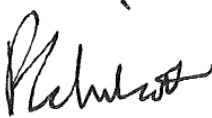
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ECOLOGICAL IMPACT ASSESSMENT

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EXECUTIVE SUMMARY

Ecological Survey and Assessment Ltd (ECOSA) have been appointed by Breithorn Developments Ltd to undertake an Ecological Impact Assessment to support a planning application for the redevelopment of No.1 Reading, 29-35 Station Road, Reading. The site is located in the centre of Reading, Berkshire and comprises a derelict six-storey office building and associated hardstanding. The proposals entail redevelopment of the site for hotel, office and retail mixed use.

The main findings of the Ecological Impact Assessment are:

- There are no designated sites for nature conservation within one kilometre of the site boundary.
- There are no habitats of inherent ecological value on or adjacent to the site.
- The site has negligible suitability to support roosting bats and is unlikely to support notable breeding birds.
- The site supports breeding feral pigeons and recommendations are made for avoidance of impacts of nesting birds.
- Enhancements in the form of a peregrine falcon nesting ledge and a brown roof to attract black redstart are included.
- Given the impacts identified, and the mitigation measures proposed it is considered that the proposals accord with all relevant local and national planning policy.
- If the planning application boundary changes or the proposals for the site alter, a re-assessment of the scheme in relation to ecology may be required. Given the mobility of animals and the potential for colonisation of the site over time, updating survey work may be required, particularly if development does not commence within 12 months of the date of the most recent relevant survey.

1.0 INTRODUCTION

1.1 Background

Ecological Survey & Assessment Limited (ECOSA) have been appointed by Breithorn Developments Ltd to undertake an Ecological Impact Assessment to support a planning application for the redevelopment of No.1 Reading, 29-35 Station Road, Reading RG1 1EQ (hereafter referred to as the site).

1.2 The Site

The site is located in Reading, Berkshire, centred on National Grid Reference (NGR) SU 7159 7369 (**Map 1**).

The site is located in the centre of Reading and comprises a derelict six-storey office block and surrounding hardstanding.

To the immediate east of the site is a busy town centre road, whilst immediately north is a more minor thoroughfare. Another high-rise office block adjoins the site to the south and a high-rise office is located a few metres west. High-rise buildings predominate in the wider surrounding, with Reading train station approximately 150 metres to the north.

1.3 Aims and Scope of Report

The information within this report is based on a field survey and desktop study carried out during October 2018. The report describes the habitats and species (hereafter referred to as ecological features) within the site's Zone of Influence (Paragraph 3.2), and provides a detailed assessment of potential ecological effects of the proposed development of the site. It identifies the need for any measures to avoid, mitigate or compensate for significant adverse effects¹ on habitats and species and outlines enhancements to the site's ecology to be implemented as part of the development. The objectives of the assessment are:

- To provide baseline information on ecological features within the site's Zone of Influence;
- To assess, characterise and quantify the effects on ecological features, including cumulative effects, and identify effects in the absence of any mitigation;

¹ For the purposes of this assessment a 'significant' adverse effect is one which will have an adverse effect on the ecological feature at the site level or higher.

- To set out measures to avoid, mitigate and compensate for significant ecological effects in accordance with the 'mitigation hierarchy'²; and
- To outline opportunities for enhancement in order to achieve a net gain for biodiversity.

1.4 Site Proposals

The site has been derelict for several years. The site area is 0.09ha; proposals involve the demolition of the existing building and erection of a replacement mixed use 22-storey building consisting of a hotel (Class C1), office (Class B1a) and flexible ground floor retail use (Classes A1, A2, A3, A4 and A5 use), with associated servicing from Garrard Street.

The Ecological Impact Assessment is informed by the site location plan produced by BroadwayMalyan, dated September 2018 (Drawing No. 33080-A-02-001 (**Map 1**)).

Planning permission is being sought during autumn 2018 with construction proposed to commence soon after permission has been granted.

² In accordance with CIEEM Ecological Impact Assessment guidance (CIEEM, 2016) a sequential process is adopted to address impacts on features of ecological interest, with 'Avoidance' prioritised at the top of the hierarchy and Compensation/Enhancement' at the bottom. This is often referred to as the 'mitigation hierarchy'.

2.0 PLANNING POLICY CONTEXT

2.1 Introduction

This section summarises the planning policy in relation to ecology and biodiversity within the Reading Borough Council administrative area. This information is then used to assess the compliance of the scheme in relation to relevant planning policy and where necessary used to inform the necessary mitigation, compensation and enhancement measures (see Section 5.0).

2.2 Planning Policy

2.2.1 National Policy

The National Planning Policy Framework (NPPF) sets out the government's requirements for the planning system in England. The original document was published in 2012 with the revised NPPF published in July 2018. A number of sections of the NPPF are relevant when taking into account development proposals and the environment. As set out within Paragraph 11 of the NPPF *"Plans and decisions should apply a presumption in favour of sustainable development"*. However, Paragraph 177 goes on to state that *"The presumption in favour of sustainable development does not apply where development requiring appropriate assessment because of its potential impact on a habitats site³ is being planned or determined"*.

The general impetus of the NPPF in relation to ecology and biodiversity is for development proposals to not only minimise the impacts on biodiversity but also to provide enhancement. Paragraph 170 states that the planning system should contribute to and enhance the natural 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..."*.

A number of principles are set out in Paragraph 175, including that where harm cannot be adequately avoided then it should be mitigated for, or as a last resort, compensated for. Where impacts occur on nationally designated sites, the benefits must clearly outweigh any adverse impact and incorporating biodiversity in and around developments should be encouraged. Specific reference is also made to the protection of irreplaceable habitats⁴. Where loss to irreplaceable habitats occur planning permission would normally be refused unless there are wholly exceptional reasons and

³ The NPPF defines a habitats site as *"Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites."*

⁴ The NPPF defines irreplaceable habitats as *"Habitats which would be technically very difficult (or take a very significant time) to restore, recreate or replace once destroyed, taking into account their age, uniqueness, species diversity or rarity. They include ancient woodland, ancient and veteran trees, blanket bog, limestone pavement, sand dunes, salt marsh and lowland fen."*

an adequate compensation strategy is in place. Paragraph 175 also states *“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”*. Protection of sites proposed as Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites or acting as compensation for SPAs, SACs and Ramsar sites, should receive the same protection as habitat sites.

In addition to the NPPF, Circular 06/05 provides guidance on the application of the law relating to planning and nature conservation as it applies in England. Paragraph 98 states *“the presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat”*. Whilst paragraph 99 states *“it is essential that the presence or otherwise of a protected species, and the extent that they may be affected by the proposed development, is established before planning permission is granted”*.

2.2.2 Local Policy

Local planning policy for Reading Borough Council is provided by the Core Strategy (Adopted 2008, altered January 2015). A single policy makes specific reference to ecology and biodiversity:

- CS36: Biodiversity and Geology. 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.

Reading Borough Council submitted their new Local Plan to the Secretary of State on 29th March 2018. This contains the following policies of relevance to ecology and biodiversity:

- EN12: Biodiversity and the Green Network. On all sites, development should not result in a net loss of biodiversity 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.
- CR10: Tall Buildings. Consider innovative ways of providing green infrastructure, such as green walls, green roofs and roof gardens.

Additionally, the supporting text to policy CR2: Design in Central Reading states that *“brown roofs in particular are of benefit to species such as black redstarts, one of the priority species in the Biodiversity Action Plan, which have been sighted in the central area.”*

3.0 METHODS

3.1 Introduction

This section details the methods used during the field survey and desktop study carried out as part of the Ecological Impact Assessment. Any significant limitations to the assessment are also considered.

3.2 Zone of Influence

To define the total extent of the study area for this assessment (Zone of Influence⁵), the proposed scheme was reviewed to establish the spatial scale at which ecological features could be affected. The appropriate survey radii for the various elements of the assessment (i.e. desktop study and field survey) have been defined in the relevant sections below. These distances are determined based on the professional judgement of the ecologist leading the appraisal, taking into account the characteristics of the site subject to appraisal, its surroundings and the nature and scope of the proposals.

3.3 Scoping

Protected species considered within this appraisal are those species/species groups considered likely to be encountered given the geographical location and context of the site. As the impacts of the proposed works are limited to within the footprint of the on-site buildings only species likely to occur within buildings have been considered within this appraisal. These are discussed within the results section (Section 4.0) of the current report. Where such a species is unlikely to be present on site a justification for likely absence is provided. Species considered likely absent from the site are not then considered in the assessment of ecological effects and mitigation measures section (Section 5.0) of this report.

3.4 Desk Study

3.4.1 Biological Records Centre

Thames Valley Environmental Records Centre (TVERC) was consulted on 26th September 2018 for the following data:

- Records of non-statutory designated sites (Local Wildlife Sites (LWSs), Sites of Importance for Nature Conservation (SINCs), Site of Nature Conservation Interest (SNCIs) etc.) within one kilometre of the site boundary. See **Appendix 1** for details;

⁵ The Zone of Influence (Zoi), as defined by CIEEM, is the area over which ecological features may be subject to significant effects as a result of the proposed project and associated activities.

- Records of legally protected and notable species (flora and fauna) within one kilometre of the site boundary, including priority species and Species of Principal Importance (**Appendix 2**); and
- Records of bats within two kilometres of the site boundary. Bat species are highly mobile and therefore the search radius is increased for this species group.

3.4.2 Multi-Agency Geographic Information for the Countryside

The Multi-Agency Geographic Information for the Countryside (MAGIC) (DEFRA, 2018) database was reviewed on 3rd October 2018 to establish the location of statutory designated sites located within the vicinity of the site. This included a search for all internationally and nationally designated sites such as Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Wetlands of International Importance (Ramsar sites), Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs) and Local Nature Reserves (LNRs) within one kilometre of the site. Where appropriate, the desk study search area has been extended to take account of any appropriate statutory designated sites which need consideration in terms of potential in-direct effects and which support particularly mobile species⁶. The Impact Risk Zones (IRZ) were also obtained from MAGIC, which are used to help guide and assess planning applications for likely effects on SSSIs.

Sites within one kilometre of the site boundary where European Protected Species Mitigation (EPSM) licences have been granted were reviewed. This information allows a greater understanding of the potential for European protected species to be present in the local area.

3.5 Field Survey

The field survey broadly followed standard Phase 1 habitat survey methodology (JNCC, 2010) and included a search for evidence of, and an assessment of the site's suitability to support, protected and notable species as recommended by CIEEM (CIEEM, 2017). The field survey covered all accessible areas of the site, including boundary features and photographs are provided, where relevant.

3.5.1 Protected and Notable Species Appraisal

A preliminary appraisal of the site's suitability to support legally protected and notable species was carried out. The following species/species groups were considered during the appraisal.

⁶ Search areas for bat records are based upon information contained within Collins, J. (Ed.) (2016) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (Third Edition). The Bat Conservation Trust, London. Relevant distances for consideration of impacts on SPAs, SACs, Ramsar sites have been based on current published guidance available through web-based sources.

Bats

The survey conformed to current Bat Conservation Trust guidelines (Collins, 2016). An assessment was made of the suitability of buildings on the site and immediately on the site boundary to support roosting bats based on the presence of Potential Roosting Features such as loose or missing roof tiles or lifted lead flashing. A detailed external and internal inspection of accessible structures was undertaken to compile information on potential and actual bat entry/exit points; potential and actual bat roosting locations; any evidence of bats found.

The assessment of the suitability of the site to support roosting bats is based on a four-point scale as detailed in **Appendix 3**.

Birds

The appraisal of breeding birds on the site was based on the suitability of habitat present to support nesting bird communities, the presence of bird species that may potentially nest within the available habitat and evidence of nesting such as old or currently active nests.

Other Relevant Species

An assessment was made of site suitability for other notable species or protected species, Species of Principal Importance for the Conservation of diversity in England notified under Section 41 of the NERC Act 2006 and as listed in the England Biodiversity List, and Local Biodiversity Action Plan (LBAP) species⁷, specific to the study region.

Invasive Species

During the field survey any incidental records of invasive species listed on Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) were recorded. However, it should be considered that the survey was not specifically aimed at assessing the presence of these species and further specialist advice may need to be sought.

3.6 Field Survey Details

The field survey was carried out by Graeme Down, Senior Ecologist of ECOSA on 2nd October 2018. The weather conditions were dry and overcast with 100% cloud cover, an ambient temperature of 16°C and a fresh westerly breeze.

During the survey, the surveyor was equipped with a ladder, 8x42 binoculars, a high powered torch and a digital camera.

⁷ LBAPs identify local priorities for biodiversity conservation by translating national targets for species into effective action at the local level and identifying targets for species important to the local area.

3.7 Field Survey Limitations

Ecological surveys are limited by factors which affect the presence of plants and animals such as the time of year, migration patterns and behaviour. The field survey has therefore not produced a complete list of plants and animals and in the absence of evidence of any particular species should not be taken as conclusive proof that the species is absent or that it will not occur in the future.

4.0 BASELINE ECOLOGICAL CONDITIONS

4.1 Introduction

This section details the results of the field survey and desktop study undertaken as part of the Ecological Impact Assessment for the site. It assesses the baseline ecological conditions of the site at the time the desktop study was completed and based on the ecological features recorded during the field survey carried out on 2nd October 2018.

4.2 Statutory and Non-statutory Designated Sites

Details of designated sites are provided in the paragraphs below.

4.2.1 Statutory Designated Sites

There are no statutory designated sites of nature conservation interest situated within one kilometre of the site boundary.

4.2.2 Non-Statutory Designated Sites

There are three non-statutory designated sites of nature conservation situated within one kilometre of the site boundary. These are:

- Cow Lane Depot (LWS) – 800 metres west of the site and designated for a mosaic of habitats;
- Holy Brook (LWS) – 800 metres south and designated for chalk river habitat; and
- River Kennet/Kennet and Avon Canal (LWS) - one kilometre south and designated for chalk river habitat.

4.3 Habitats

4.3.1 Desktop Study Results

Consultation with MAGIC revealed no notable habitats on or adjacent to the site.

Consultation with TVERC produced records of priority habitats 'lowland mixed deciduous woodland' and 'mixed woodland' within the desktop study area, however, these are separated from the site by several hundred metres of existing urban development and infrastructure.

4.3.2 Field Survey Results

Habitats are described in general terms using standard Phase 1 habitat survey terminology. The main habitats recorded on site during the Phase 1 habitat survey were as follows:

Building

The site is dominated by a six-storey office block (**Figure 1** and **Figure 2**). The building is described in full detail with regard to suitability for supporting bats and birds under Paragraph 4.4. The fifth floor of the building has a parapet wall on the eastern side (**Figure 3**)



Figure 1: Western elevation of building on site



Figure 2: Eastern elevation of building on site



Figure 3: Parapet wall on eastern elevation of building on site

Other Habitats

The building is surrounded to west, east and north by hardstanding, and two areas of hardstanding to the east of the building lie within the site boundary. These areas are tarmac surfaced and unvegetated.

Summary

The habitats on site comprise only a single building and two small areas of hard standing.

4.4 Notable and Legally Protected Species

4.4.1 Bats

Desktop Study Results

Consultation with MAGIC produced records of two extant EPSM licences for bats within one kilometre of the site. Both relate to bat resting places rather than breeding locations. The closest of these is 350 metres to the north-east and for Daubenton's bats *Myotis daubentonii* (Licence 2017-28045-EPS-MIT). An EPSM licence for common pipistrelle *Pipistrellus pipistrellus* 900 metres south-east of the site also exists (Licence 2016-22301-EPS-MIT).

Consultation with TVERC produced records of bats within the desktop study area. Species recorded include serotine *Eptesicus serotinus*, Daubenton's, noctule *Nyctalus noctula*, Nathusius' pipistrelle *Pipistrellus nathusii*, common pipistrelle, soprano pipistrelle *Pipistrellus pygmaeus* and brown long-eared *Plecotus auritus* bats. Common pipistrelle and soprano pipistrelle are by far the most recorded species.

Building Assessment

The office building on site has six storeys (including a basement level) and is of varied external construction.

The western elevation (**Figure 1**) is of brick construction with several large flat paned windows located on each floor. The eastern elevation is of similar brick construction in places but contains a large continuous façade of windows on each floor with the floors separated by ceramic tiling or by painted boarding and with concrete horizontal and vertical supports (**Figure 2**). The northern elevation of the building is brick on all except the lowest floors, which are clad in painted concrete (**Figure 4**). The exterior brickwork of the building is sound and no gaps in the walls offering suitability to access by roosting bats were observed. Many of the windows are either open or have no glass remaining.

On the western elevation of the building, the building exterior extends below ground level to a basement that is open to the surroundings via an open doorway.



Figure 4: Northern elevation of building on site

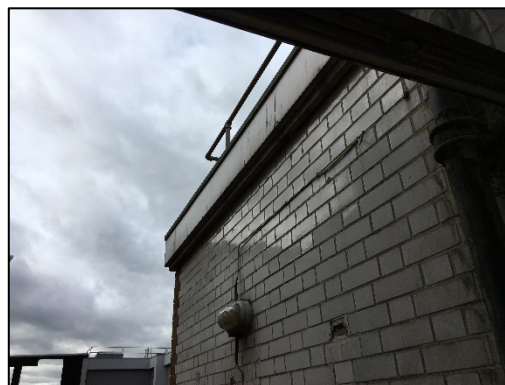


Figure 5: Lip of roof lacking soffits

The roof of the building is on several levels and is flat and of concrete construction. A parapet wall extends along the eastern side of the building (**Figure 3**). The interface between walls and roof is largely fascia boarding over a concrete lip flush to the façade (**Figure 5**), but in places there are soffits extending out from the wall (**Figure 6**). These are generally sound with the exception of the south-western corner of the building where the soffit material has crumbled, but has not left a void that would be accessible to bats.



Figure 6: Lip of roof area with soffits



Figure 7: Interior of building

The interior of the building consists of several rooms on each level, some of which are open plan, others smaller, with ceiling panels between floors (**Figure 7**), many of which are missing leaving gaps between ceiling and floors of next level up. These areas are light and open and draughty and lack roosting opportunities for bats.

Above the fifth level of the building are two kiosk type buildings on the roof itself. These are open to the elements, including wind and light and lack internal structures suitable for roosting bats such as beams or rafters (**Figure 8**).

The basement level of the building is accessible via open exterior doorways and is also draughty and lacks roosting structures, although is considerably less well lit than upper floors (**Figure 9**). The basement consists of two connected rooms, the interior of which contains a small alcove that appears not to lead to wall cavities and additionally is cobwebbed indicating lack of use by bats (**Figure 10**).



Figure 8: Kiosk on roof of building



Figure 9: Interior of basement of the building on site



Figure 10: Inner room of the interior of the basement of the building on site

The building shows signs of extensive use by pigeons and rodents.

Overall the building contains no features that are likely to be used by roosting bats and no evidence of bats was recorded. The site does not offer features that are likely to be attractive to foraging and commuting bats. The site has negligible suitability to support roosting, foraging or commuting bats and bats are not considered further in this report.

4.4.2 Birds

Desktop Study Results

Consultation with TVERC produced records of birds within the desktop study area, including peregrine falcon *Falco peregrinus* and black redstart *Phoenicurus ochruros*.

Field Survey Results

The only species of bird observed during the site visit was feral pigeon *Columba livia*. Only one bird was observed, but the building shows extensive use by pigeons in the form of feathers and droppings.

The site has limited suitability for peregrine falcon as the building is considerably lower than buildings in the immediate surrounding, and which are more likely to attract nesting and hunting birds due to improved vantage points and unhindered flying to and from rooftop perches.

The site also lacks suitability to support nesting black redstart as cavities and ledges favoured by this species are absent, and there is no suitable foraging habitat on site or in the immediately surrounding area.

4.4.3 Other Relevant Species

Consultation with TVERC produced records of other notable species within the desktop study area but none that would be likely to occur on or adjacent to the site.

Field Survey Results

The site does not offer suitability for other notable species to be present as it lacks suitable habitats that would support such species. Therefore, no other species or species groups are considered further in this report.

4.5 Summary of Key Ecological Features

The site lacks suitable for protected or notable species other than nesting feral pigeons.

5.0 ASSESSMENT OF ECOLOGICAL EFFECTS AND MITIGATION/COMPENSATION/ENHANCEMENT MEASURES

5.1 Introduction

This section assesses the ecological effects of the proposed development scheme on the identified ecological features as identified in Section 4.0. Methods for addressing potential impacts and effects on ecological features have been approached in accordance with the mitigation hierarchy⁸ with avoidance of impacts prioritised where possible. Where significant adverse effects cannot be avoided other forms of mitigation are prioritised over compensation. Enhancement measures have been detailed, where relevant, in order to not only minimise the impacts on biodiversity but also to provide enhancement in accordance with Paragraph 170 of the NPPF (Paragraph 2.2.1). It is anticipated that mitigation, compensation and enhancement measures will be secured through the planning process.

5.2 Scheme Design

The site area is 0.09ha; proposals involve the demolition of the existing building and erection of a replacement mixed use 22-storey building consisting of a hotel (Class C1), office (Class B1a) and flexible ground floor retail use (Classes A1, A2, A3, A4 and A5 use), with associated servicing from Garrard Street.

The potential ecological impacts and effects of these proposals, in the absence of mitigation, are described for each ecological feature below. For each ecological feature, measures to mitigate and/or compensate for significant effects are described.

5.3 Designated Sites

5.3.1 Potential Impacts and Effects

There are no designated sites that would be affected by the proposals.

5.3.2 Mitigation and Compensation Measures

No mitigation or compensation for designated sites is required.

5.3.3 Enhancement

No enhancement for designated sites is proposed.

⁸ In accordance with CIEEM Ecological Impact Assessment guidance (CIEEM, 2016) a sequential process is adopted to address impacts on features of ecological interest, with 'Avoidance' prioritised at the top of the hierarchy and Compensation/Enhancement' at the bottom. This is often referred to as the 'mitigation hierarchy'.

5.4 Habitats

5.4.1 Potential Impacts and Effects

No habitats of intrinsic ecological interest will be lost or impacted through the proposed development.

5.4.2 Mitigation and Compensation Measures

No mitigation or compensation for habitats is required.

5.4.3 Enhancement

The ecological value of the habitats on site will be enhanced through the provision of a low maintenance brown roof area on a section of rooftop of the new building. This will be allowed to vegetate naturally. The roof will be underlaid with a waterproof membrane upon which crushed rock will be laid evenly. A small number of mounded stone piles and deadwood piles will be created which will provide opportunities for invertebrate species to colonise.

5.5 Birds

5.5.1 Potential Impacts and Effects

The proposed development will involve the demolition of the existing derelict building. At present there is evidence that feral pigeon are using the building and it is highly likely that they are breeding on site. As such, unmitigated, there is a potential impact on nesting pigeons through damage or destruction of active nests. Unless killing of the birds under a general licence can be undertaken through demonstrating a risk to public health or safety then mitigation will be required.

All birds, their nests, eggs and young are legally protected, with certain exceptions, under the Wildlife and Countryside Act 1981 (as amended). Refer to **Appendix 2** for details.

5.5.2 Mitigation and Compensation Measures

Works should ideally be undertaken outside of the months of March to August inclusive, as this represents the main nesting bird season. Although feral pigeons are known to nest in all months of the year, attempts are likely to be far fewer in winter, particularly as the site is draughty and relatively open to the elements.

It is recommended that an inspection of the building be undertaken between October and February by a specialist pest control contractor, following which it is likely that if pigeons are occupying the building, the course of approach will be to disperse and deter pigeons from re-entering. This may include the need for placement of deterrents (e.g. acoustic deterrents) and/or sealing of entry points for birds using boarding of

windows and gaps and/or netting of a gauge that will prevent pigeons from entering whilst not allowing them to become entrapped.

Once pigeons are dispersed and deterred outside of the peak breeding season, then building demolition can be undertaken at any point.

Once the building has been demolished, if rubble mounds are created, these should not be allowed to remain undisturbed during the nesting bird season as it is possible that species such as black redstart could attempt to nest. Rubble piles should be removed, or levelled out, covered, or be regularly disturbed if present during the bird nesting season.

5.5.3 *Enhancement*

The brown roof area discussed in Paragraph 5.4.3 will provide habitat that is favoured by black redstart for foraging as it will support a variety of invertebrates on which the bird will feed. Two WoodStone Build-In Open Nest Boxes (or similar) will be installed above the 5th floor rooftop brown roof on the western face of the building in order to attract black redstart to breed.

The proposed development will provide a 22-storey building that will be considerably higher than surrounding buildings. This is likely to make the site attractive to perching and possibly nesting peregrine falcons. Therefore, a peregrine nest box will be installed on the eastern side of the roof top – an example of an appropriate design would be a Schwegler Peregrine Falcon Nest Box (or similar).

5.6 Cumulative Effects

Given the mitigation measures outlined above, no significant residual effects are anticipated on any of the species considered. Therefore, there will be no cumulative effects on local populations as a result of the development.

6.0 CONCLUSIONS

6.1 Conclusion

The site currently supports minimal biodiversity in terms of habitats and protected species. Adverse impacts on feral pigeons have been identified and appropriate mitigation measures proposed. No residual or cumulative impacts are anticipated. Post-development the site will be enhanced through the installation of a low maintenance brown roof. Opportunity for nesting peregrine falcon will be provided through provision of a nest box. The inclusion of a brown roof and opportunities for nesting birds represents a net gain in ecological value of the site. As such it is considered that the proposals will accord with all relevant national and local planning policy in relation to ecology including Policy CS36 of the existing Core Strategy, policies EN12, CR2 and CR10 of the emerging Submission stage replacement Local Plan, and the NPPF (see Section 2.0).

6.2 Updating Site Survey

If the planning application boundary changes or the proposals for the site alter, a re-assessment of the scheme in relation to ecology may be required. Given the mobility of animals and the potential for colonisation of the site over time, updating survey work may be required, particularly if development does not commence within 12 months of the date of the most recent relevant survey.

7.0 REFERENCES

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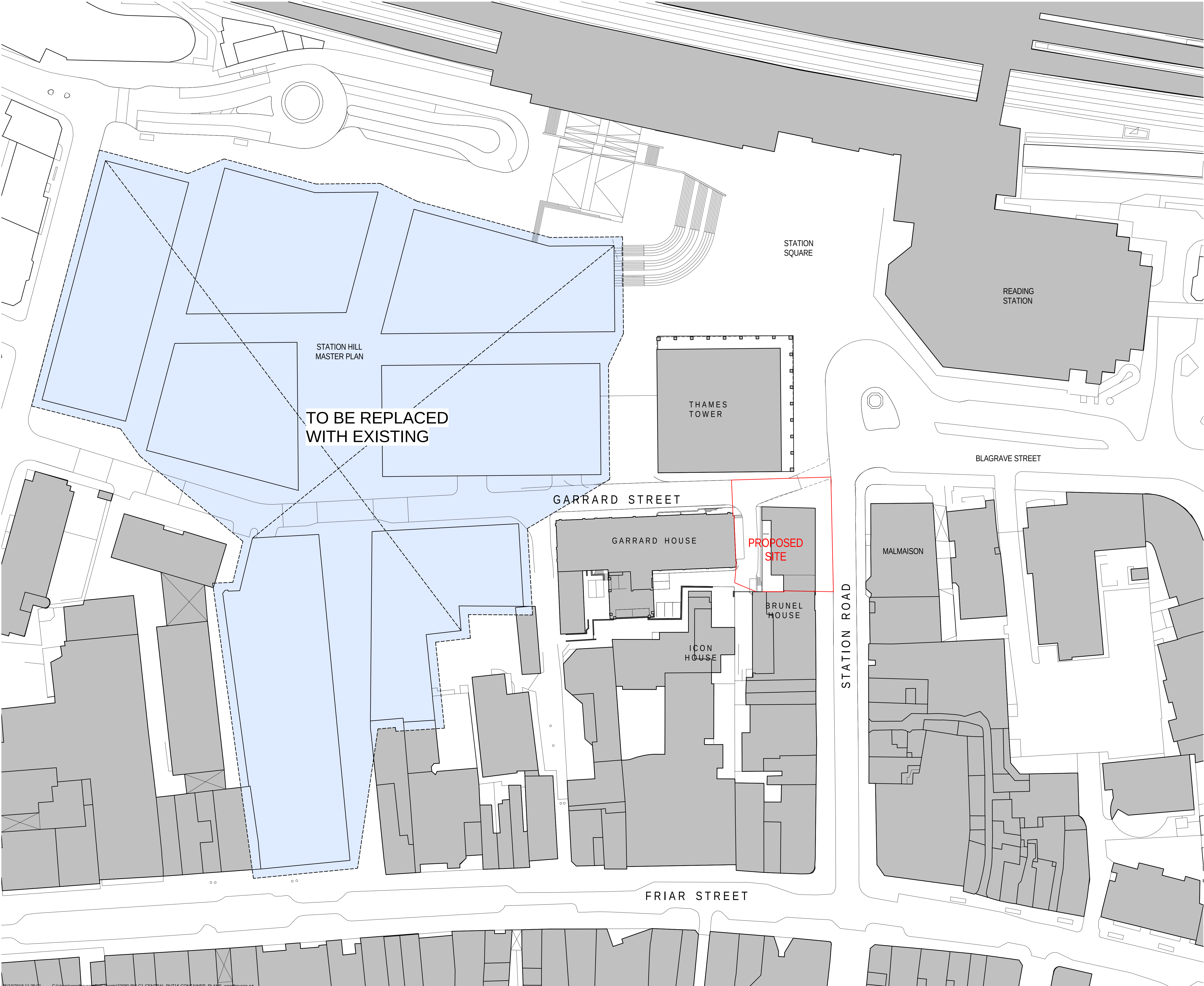
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Map 1 Site Location Plan

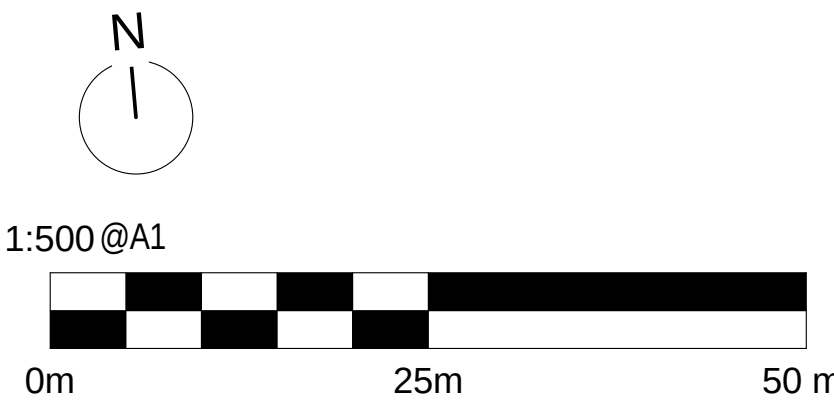


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PROPOSED SITE AREA:
0.09ha

B	25.10.18	Issued for Planning
A	04.10.18	Site boundary confirmed
	18.09.18	First issue
Revision	Date	Description

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Description
Site Location Plan

Status
PRELIMINARY

Scale 1:500@A1	Drawn By DJ	Date 20/09/18
Job Number 33080	Drawing Number A-02-001	Revision B

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Appendix 1 Sites Designated for Nature Conservation

Non-Statutory Sites

Locally Designated Sites

In addition to statutory designations, local authorities often designate sites of nature conservation importance at the local level. Such designations are named differently by each local authority and may be referred to as Local Wildlife Sites (LWS), Sites of Importance for Nature Conservation (SINC) or Sites of Nature Conservation Importance (SNCI), amongst others. The exact level of protection afforded to these sites varies and is normally defined through local planning policy.

Appendix 2 Relevant Legislation

Breeding Birds

With certain exceptions, all wild birds, their nests and eggs are protected by Section 1 of the Wildlife and Countryside Act 1981 (as amended). Therefore, it is an offence, to:

- Intentionally kill, injure or take any wild bird;
- Intentionally take, damage or destroy the nest of any wild bird while it is in use or being built; or
- Intentionally take or destroy the egg of any wild bird.

These offences do not apply to hunting of birds listed in Schedule 2 subject to various controls. Bird species listed on Schedule 1 of the Act receive further protection, thus for these species it is also an offence to:

- Intentionally or recklessly disturb any bird while it is nest building, or is at a nest containing eggs or young; or
- Intentionally or recklessly disturb the dependent young of any such bird.

Appendix 3 Appraisal Criteria for Bats

The criteria used to assess the suitability of roosting habitat for bats is based on industry guidelines and outlined in **Table 1**⁹.

Table 1: Criteria used to Assess Suitability of Roosting Habitat for Bats

Suitability	Description of roosting habitats
High	A structure or tree with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat.
Moderate	A structure of tree with one or more potential roost sites 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 structure with one or more potential roost sites that could be used by individual bats opportunistically/structure that does not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity or hibernation). A tree of sufficient size and age to contain potential roost features but with none seen from the ground or features seen with only very limited roosting potential.
Negligible	Negligible habitat features on site likely to be used by roosting bats.

⁹ Table adapted from (Collins, 2016)