



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

Bat Survey Report

Prepared by
CSA Environmental

on behalf of
Savills

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EXECUTIVE SUMMARY

Development is proposed at 173-175 Friar St and 27-32 Market Place, Reading, for which planning permission will be sought. The proposals are understood to comprise the construction of a new multi-storey building and the conversion of the existing listed building on Market Street to provide office, retail and residential properties.

CSA Environmental was instructed by Savills in October 2017 to undertake an inspection of the buildings on-site in order to assess their potential to support roosting bats. 173-175 Friar Street has 'Negligible' potential to support roosting bats and the bat roost potential of 27-32 Market Place is 'Low' given the presence of features suitable for individual crevice dwelling bats, such as slipped/missing tiles and weatherboarding.

Based on the survey findings works can commence with regard to 173-175 Friar Street buildings without further considered of bats.

No significant adverse effects are considered likely in respect of the remaining buildings (27 – 32 Market Place), given its context and condition. Precautionary surveys are proposed prior to commencement of works to further reduce the likelihood of any potential impacts to bats and ensure legal compliance.

1.0 INTRODUCTION

- 1.1 This report has been prepared by CSA Environmental on behalf of Savills. It sets out the findings of bat survey work undertaken at 173-175 Friar St and 27-32 Market Place, Reading (hereafter referred to as 'the Site').
- 1.2 The Site is located around central grid reference SU 71670 73504, in the centre of Reading. The Site comprises a complex of buildings previously used as retail and office units.
- 1.3 Redevelopment of the Site for residential and commercial use is proposed. Proposals include retail units on the ground floor, offices on the first and third floors and apartments between the fourth and seventh floors with a series of roof terraces, a green roof and a shared courtyard space.
- 1.4 An inspection of the buildings at the Site was carried out on 01 and 14 November 2017.
- 1.5 The purpose of these surveys was to assess the potential for the buildings to support roosting bats and, based on the outcome of that assessment, to confirm the presence/likely absence of roosting bats in association with these structures.
- 1.6 The content of this report has been determined with due consideration for best-practice guidance provided by the Chartered Institute of Ecology and Environmental Management (CIEEM, 2015; 2016).

2.0 LEGISLATION, PLANNING POLICY & STANDING ADVICE

2.1 All species of British bats are legally protected under part 3 (section 41) of the Conservation of Habitats and Species Regulations 2010. These Regulations make it an offence to:

- Deliberately capture, injure, kill or capture a bat;
- Deliberately disturb bats, impairing their ability to survive, breed, reproduce or rear/nurture their young;
- Damage or destroy a breeding site or resting place used by bats; or
- Be in possession of, transport, sell, exchange or offer to sell/exchange a bat (dead or alive) or any part of a bat.

2.2 All bats and their roosts in England, Scotland and Wales were originally protected under the Wildlife & Countryside Act 1981. Subsequent amendments to the legislation for England and Wales has removed bats from most of the provisions of the Act, however it remains an offence to:

- Intentionally or recklessly disturb a bat while it is occupying a structure or place which it uses for shelter or protection; or
- Intentionally or recklessly obstruct access to any structure or place that a bat uses for shelter or protection.

2.3 Disturbance of bats is covered by both the 2010 Regulations and the 1981 Act, with the magnitude of disturbance critical. Disturbance that impairs survival or successful reproduction would be covered by the Regulations with no legal defence existing. Less significant acts of disturbance may only be covered by the Wildlife & Countryside Act 1981, which includes some legal defences that may be applied in certain circumstances.

2.4 It is important to note that bat roosts are protected throughout the year, regardless of whether or not bats are present at the time. Under the Conservation of Habitats and Species Regulations the offence of damaging or destroying a breeding site or resting place of bats is not subject to any legal defence, i.e. an offence will have been committed even if the damage or destruction occurs accidentally.

Licensing

2.5 Where development is proposed that would result in an offence under the Habitats and Species Regulations a European Protected Species (EPS) licence needs to be granted by Natural England to permit an act that would otherwise be unlawful. This provides for a specific derogation from the legislation, to prevent a legal infringement occurring. To obtain an EPS licence for development it must be demonstrated that the purpose of the act to be licensed is for:

- *“preserving public health or public safety or other imperative reasons of overriding public interest including those of social or economic nature and beneficial consequences of primary importance for the environment” (Regulation 53(2)(e)).*

2.6 In addition Natural England will not grant an EPS licence unless they are satisfied that:

- *“There is no satisfactory alternative” (Regulation 53(9)(a)); and*
- *“The action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range” (Regulation 53(9)(b)).*

3.0 METHODOLOGY

Field Survey

Building Inspection

- 3.1 A detailed external and internal inspection of all buildings on-site was completed, using high-powered torches, binoculars and a ladder as appropriate, with the aim of identifying the potential for these structures to support roosting bats.
- 3.2 External inspection focused on identifying potential bat access points to the interior of each structure and any external features that could potentially be used by crevice-dwelling species. Particular attention was paid to window sills, window panes, weatherboarding, and pitch/ridge tiles; as evidence is typically found in these locations.
- 3.3 Internal inspection involved a systematic search for bats or any evidence of their activity, in particular droppings and/or feeding remains.
- 3.4 Following inspection, the structures were categorised in terms of their bat roost potential ('High', 'Moderate', 'Low' or 'Negligible'), based on the criteria set out in the Bat Conservation Trust (BCT) guidelines (2016).
- 3.5 Note that a structure's bat roost potential is influenced by its age and construction, thermal stability, lighting, levels of human activity and proximity to foraging habitat - particularly woodland, parkland and wetland. The degree of bat roost potential is used to determine whether or not further nocturnal survey(s) would be appropriate, and if so, the level of survey effort required.

Limitations

- 3.6 The basement of 173-175 Friar Street was not accessible at the time of survey due to the presence of asbestos. A small structure/room located on the roof of the building was not accessible via the loft hatch on the third floor or from the roof due to access points being blocked off. The exterior of this structure/room was well sealed with a flat bitumen felt roof which did not appear to have a void. Given the suitability of the rest of the building it is not considered that a lack of access to these areas would severely impact the outcome of the survey.
- 3.7 The first, second and third floors and the roof void of 32 Market Place were not accessible at the time of survey due to access points being blocked off. However, the ground floor was inspected internally and the building was accessed from the exterior for inspection. Given the suitability of the rest of the building it is not considered that a lack of access to these areas would severely impact the outcome of the survey.

- 3.8 Prior to the survey, evidence of bats may have been removed/obscured as pigeons and associated guano had recently been cleared from the roof void of 29-31 Market Place with chicken wire placed on windows to exclude pigeons. Further survey recommendations have been made on the basis of the suitability of this building for bats rather the presence/absence of bat evidence (which may or may not have resulted from recent pigeon removal).

4.0 RESULTS

Building Inspection (01/11/2017 & 14/11/2017)

4.1 The results of the building inspection(s) are presented in Table 4.1 below.

Table 4.1. Results of Building Inspection Survey

Building Ref.	Building Description	External features/ evidence	Internal features/ evidence	Bat roost potential
173-175 Friar Street 'Bristol and West Arcade'	Structure – Intact brickwork and mortar. Sash windows, lintels, and ornate stone sections are intact. Basement – Not accessible due to asbestos. Ground floor – No access to shops. Boarded either end with a metal roll shutter. First floor – No access to room to north-east due to asbestos. Front sashed windows fixed shut. Rear windows boarded shut. Walls boarded and plastered. Ceilings intact where plastered, otherwise ceiling tiles are loose/missing in places. Second Floor - No access to room to south-east due to asbestos. Windows, walls and ceilings as first floor. Third Floor – Windows, walls and ceilings as first floor. No access to small structure/room located on the roof of the building, hatch locked and boarded from outside. Roof – flat roof with bitumen felt.	None.	None. Rat droppings present throughout building. Old bird nesting material present on ground floor. Bird droppings on second floor.	Negligible
27-28 Market Place 'Kik Sports'	Structure – 'mock' tudor timber frame with brick and render. Basement - access to basement from interior stairs only. Ground floor – windows and door boarded, no access for bats. First and second floor – prior use as office, no access for bats. Third floor – dormer windows, no access to roof void. Hole in ceiling into roof void – potentially only around dormer. Bitumen lined with small tear. Extent of void unknown.	Complex roof structure with a small number of slipped/ missing tiles and weather-boarding provide potential roosts for individual crevice dwelling bats.	None. Rat droppings present on first floor.	Low

Building Ref.	Building Description	External features/ evidence	Internal features/ evidence	Bat roost potential
29-31 Market Place 'Coopers Arms'	Structure – 'mock' tudor timber frame with brick and render. Ground floor windows and door boarded. Basement - access to basement from interior stairs and externally via trap door to street. No access for bats. Ground floor – former pub, complex structure with bathrooms, kitchen and bar area. Double height, pitched glass roof above centre of room. Walls combination of wood panelling, plaster and exposed brickwork. Some areas of weatherboarding in interior of building. Sealed windows to higher floors in double height section. First floor & second floor – former residential dwelling. Complex arrangement of rooms with timber structure exposed in places. Number of fireplaces present. Exposed wooden structure, missing floorboards, areas of rot and collapsed ceilings in places. Third floor/roof void – full height rooms, timber framed with intact bitumen felt lining, very light in places due to presence of windows.	Complex roof structure with a small number of slipped/ missing tiles and weatherboarding provide potential roosts for individual crevice dwelling bats.	None. Rat and bird droppings present throughout building (not present at a density which would obscure bat droppings). Roof void recently cleared with chicken wire on windows (see limitations).	Low
32 Market Place	Structure – Intact brickwork and mortar. Sash windows, lintels are intact. Basement - access to basement from interior stairs only. Well-sealed with safe (former bank). Ground floor – former bank, false ceiling with asbestos ceiling tiles. Well-sealed, no access for bats. First, second and third floor – only accessible from exterior.	Complex roof structure with a small number of slipped/ missing tiles and weatherboarding provide potential roosts for individual crevice dwelling bats.	None. First – third floors not accessed (see limitations).	Low

4.2 In summary, 173-175 Friar Street has 'Negligible' potential to support roosting bats and the bat roost potential of 27-32 Market Place is 'Low' given the presence of features suitable for individual crevice dwelling bats, such as slipped/missing tiles and weatherboarding.

5.0 DISCUSSION

- 5.1 The survey work undertaken to date has identified 173-175 Friar Road as having 'negligible' potential to support roosting bats. Works to these buildings can be carried out without further consideration of bats.
- 5.2 Given the presence of a small number features suitable for individual crevice dwelling bats 27-32 Market Place has 'low' potential to support roosting bats. There is no indication that this building in its current condition and context would support a significant bat roost of conservation importance. Therefore, subject to precautionary recommendations below, no significant adverse effects on bats are considered likely to occur as a result of the scheme proposals.
- 5.3 As a precaution, it is recommended that a single dusk emergence/pre-dawn re-entry survey and remote monitoring survey of 27-32 Market Place be undertaken to confirm the presence/likely absence of individual roosting bats in association prior to the commencement of works within these buildings.
- 5.4 In the very unlikely event that individual bats are identified during the precautionary surveys, mitigation measures and a European Protected Species (EPS) licence may be necessary to avoid impacts and ensure legal compliance. It is important to note that any mitigation that may be required could be readily delivered through the proposed scheme, such as through inclusion of compensatory roosting features (i.e. bat boxes).

6.0 REFERENCES

Chartered Institute of Ecology and Environmental Management, 2015. *Guidelines for Ecological Report Writing*. Winchester: CIEEM.

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Appendix A

Photosheet



Plate 1. Exterior of 173-175 Friar Street - 'Bristol and West Arcade'



Plate 2. Interior of 173-175 Friar Street - 'Bristol and West Arcade'



Plate 3. Interior of 173-175 Friar Street - 'Bristol and West Arcade'



Plate 4. Roof and small external structure/room of 173-175 Friar Street - 'Bristol and West Arcade'



Plate 5. Exterior of 27-28 Market Place - 'Kik Sports'



Plate 6. Basement of 27-28 Market Place - 'Kik Sports'



Plate 7. First floor of of 27-28 Market Place - 'Kik Sports'



Plate 8. Third floor of 27-28 Market Place - 'Kik Sports' with dormer windows



Plate 9. Roof void above dormer window on third floor of of 27-28 Market Place - 'Kik Sports'. Small tear in bitument felt lining. Visible via hole in ceiling.



Plate 10. Exterior of 29-31 Market Place 'Coopers Arms'



Plate 11. Interior of 29-31 Market Place 'Coopers Arms'



Plate 12. Interior of 29-31 Market Place 'Coopers Arms'



Plate 13. Basement of of 29-31 Market Place 'Coopers Arms'



Plate 14. Former pub room in of 29-31 Market Place 'Coopers Arms'



Plate 15. Pitched glass roof above former pub within 29-31 Market Place 'Coopers Arms'



Plate 16. Roof void of 29-31 Market Place 'Coopers Arms'



Plate 17. Bitumen lining of roof void of 29-31 Market Place 'Coopers Arms'



Plate 18. Chicken wire over window in roof void of 29-31 Market Place 'Coopers Arms'



Plate 19. Exterior of 32 Market Place (lower levels)



Plate 20. Exterior of 32 Market Place (upper levels, not accessed during survey)



Plate 21. Interior of ground floor of 32 Market Place



Plate 22. Interior of safe within basement of 32 Market Place



Plate 23. Rear exterior of 32 Market Place (interior of these levels not accessed during survey)



Plate 24. Roof structure of 27-32 Market Place



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