

Former Gas Holder Site, Reading

Ecological Protection Plan (EPP)

A Report for Danescroft Land Limited.

May 2024



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Former Gas Holder Site, Kenavon Drive, Reading, RG1 3DH

Ecological Protection Plan (EPP)

Client:	Danescroft Land Limited	
Project Ref:	Former Gas Holder Site	
Report Ref:	J20563_P6	
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Disclosure:		
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1 PROJECT OVERVIEW

Client: Danescroft LLP

Site Address: Former Gas Holder Site, Kenavon Drive, Reading, RG1 3DH

Site Proposals: Demolition of existing buildings and Gas Holder and the erection of new buildings ranging between 2 and 9 storeys in height, providing 130 residential units (Class C3) with associated access, car parking, landscaping and open space.

Associated Planning
Reference Number: 190627/FUL

Source of Relevant Documents:

Document:	Source:
Site Location Plan:	Google Earth Pro
Associated Documents:	Preliminary Ecological Appraisal (GES, 2019a) Bat Emergence Survey Report (GES, 2019b) Bat Roost and Bat Activity Report (GES, 2019c) Update Preliminary Ecological Appraisal (GES, 2020)
Proposed Works:	Farber Huxley (Drawing no: 715-FH-XX-00-DP-L-101 Illustrative Masterplan (002))

2 INTRODUCTION

2.1 Context

2.1.1 In April 2024, Greenspace Ecological Solutions (GES) was appointed by Danescroft LLP to provide ecological support in the discharge of ecological planning conditions in relation to an approved development (planning reference no. 190627/FUL) at the Former Gas Holder Site, Kenavon Drive (hereafter referred to as 'the Site'). The wording of Condition 25 (i), which relates to an ecological buffer zone, is as follows (for clarity, the decision notice is provided in Appendix A):

25 (i) "No development, except demolition, shall commence until details demonstrating how the Ecological Buffer Zone alongside the River Kennet will be protected during development, have been submitted to, and approved in writing by the Local Planning Authority. Thereafter the development shall be carried out in accordance with the approved details. Details shall include:

- a) Risk assessment of potentially damaging construction activities;*
- b) Identification of "biodiversity protection zones";*
- c) Practical measures (including sensitive working practices) to avoid or reduce impacts during construction;*
- d) The location and timing of sensitive works to avoid harm to biodiversity features;*
- e) The times during construction when specialist ecologists need to be present on site to oversee works;*
- f) Responsible persons and lines of communication;*
- g) The role and responsibilities on site of an ecological clerk of works (ECoW) or similarly competent person; and*
- h) Use of protective fences, exclusion barriers and warning signs."*

2.1.2 To address the requirements of condition 25(i) the following Ecological Protection Plan (EPP) has been prepared. The EPP presents baseline conditions and potential impacts on the river Kennet as a result of construction. This EPP also presents ecological protection measures to protect the long-term biodiversity value of the River Kennet. The EPP has been informed by the following documents, which should be referred to for the baseline site conditions, survey methods and results.

- Update Preliminary Ecological Appraisal (PEA) prepared by GES in 2020 (provided as Appendix B).
- Site plan provided in Figure 1.

- 2.1.3 The PEA was informed by an Extended Phase 1 Habitat survey, which included a Ground Level Assessment of the trees within the Site for bat roost suitability.

2.2 Site Location

- 2.2.1 The Site is located on the eastern periphery of the town of Reading, Berkshire, at National Grid reference: SU 728 736.

2.3 Site Description

- 2.3.1 The Site occupies approximately 0.71ha and comprises largely hardstanding with small areas of scrub, scattered trees and buildings. The Site is bound by residential dwellings to the east, the River Kennet to the south and east, and a railway line to the north. The wider landscape is one of residential units to the east and west, with pockets of scrubland to the north, beyond the railway.

2.4 Project Description

- 2.4.1 The approved development includes the erection of new buildings ranging between 2 and 9 storeys in height, providing 130 residential units (Class C3) with associated access, car parking, landscaping and open space.

2.5 Risk Assessment of Potentially Damaging Construction Activities

River Kennet

- 2.5.1 The River Kennet (which forms the southern Site boundary) is a chalk stream tributary of the River Thames and supports a wide assemblage of plants, invertebrates, mammals and fish as well as a range of birds, such as including Birds of Conservation Concern 5 amber list species, such as the grey wagtail and sedge warbler (Action for the River Kennet, 2004).
- 2.5.2 The approved development will include the erection of new residential buildings, therefore there is the potential for impacts on the river during the construction period. In absence of mitigation, the following potential impacts could result in adverse effects on the river:
- Chemicals and hazardous materials from construction polluting the river which could result in the destruction of the water quality and changes in air quality impacting plant species' growth, quality and diversity, and impacts on animal species.
 - Accidental debris and waste materials from construction entering the river which could result in impacts on water quality, aquatic and bankside vegetation and tree species, subsequently impacting fish, mammals, birds and invertebrates.
 - Surface water run-off entering the river, resulting in changes to and destruction of the water quality, which could result in impacts on plants, fish, invertebrates and bird species.

- Dust deposition from construction entering the River, which could result in impacts on plants, invertebrates, bird and mammal species.
- Accidental encroachment of the river during construction given the presence of the river on the east and south boundary of the Site, which could result in impacts on the habitat (trampled bankside vegetation, root compaction), birds, mammals and invertebrates.
- Impacts relating to noise, lighting and vibration on sensitive species (such as birds and fish).

2.6 Aims and Objectives of the EPP

2.6.1 The Aim of the EPP is to provide measures for the avoidance of ecological harm during construction, and, where required, mitigation to reduce ecological impacts to negligible levels. This will be achieved through the following objectives:

- Appointment of an Ecological Clerk of Works (ECoW).
- Nominating a Site 'Biodiversity Champion,' who will ensure that the measures and management prescriptions laid out in this document are adhered to.
- Installation and protection of "Biodiversity Protection Zones" using heras fencing (or similar).
- Installation of tree root protection fencing.
- Appropriate timings of work.
- Implementation of best practice construction measures.
- On-going Site checks throughout construction.

3 ROLES AND RESPONSIBILITIES

3.1 Contract Manager

3.1.1 The Contracts Manager is responsible for:

- Ensuring that the EPP is developed and maintained on-site and that it is implemented during construction.
- Ensuring the EPP details are updated as and when relevant information is provided by the stakeholders associated with each section of the EPP, e.g., further consent conditions and pre-construction surveys.
- Maintaining the EPP and ensuring that all contractors and visitors comply with it.
- Ensuring that environmental issues identified within the pre-Construction information and the pre-construction Site surveys and relevant information gathered from agencies, local councils etc. are addressed.
- Producing environmental project specific controls for all significant risks identified and implementing control measures to minimise the risk of damage to the environment.
- Communicating the EPP and other related document to employees, contractors and client representatives.

3.2 Contractors and Visitors

3.2.1 Contractors and visitors to the project will be responsible for:

- Ensuring that the control measures identified from environmental surveys are implemented as they are relevant to their work/visit.
- Ensuring that the project management team are notified of any non-conformance of control measures or environmental incident where the environment has been put at risk.

3.3 Information for Contractors and Visitors

3.3.1 All contractors and visitors to the Site will be made aware of the Environmental policy and the controls applicable to their presence and activities on-site including but not limited to:

- Method statements
- Risk Assessments
- Site induction
- Toolbox talks

3.3.2 The Project Manager will be responsible for monitoring communications between all relevant parties to the project ensuring that all environmental matters to the project are discussed and

managed and observation of the communications will be documented in the weekly Site meetings and sent by e-mail.

- 3.3.3 Relevant Site layout and location plans/CDM drawing detailing the location and construction of the Site compound, storage locations and car parking are to be displayed on an information board at the Site entrance.

3.4 Ecological Clerk of Works (ECoW)

- 3.4.1 Prior to construction, the project will appoint a suitably experienced and qualified Ecological Clerk of Works (ECoW). The role of the ECoW will include:

- Supervision of protective fencing installation and removal.
- Delivery of toolbox talks for protected species prior to vegetation removal (if required).
- Nesting bird check prior to vegetation clearance (if undertaken within the nesting bird season from mid-March to August).
- Advisory service for on-site contractors.
- Supervision of installation of enhancement features including peregrine falcon platform, bat boxes and bird boxes.

3.5 Biodiversity Champion (BC)

- 3.5.1 Prior to construction, a full-time member of the contractual team will be appointed by the ECoW as the on-site Biodiversity Champion (BC). The BC will ensure that the prescribed management plan and all the precautions and method statements set out within it are adhered to in full.
- 3.5.2 The BC will be chosen at the beginning of the construction phase. The BC will be given the authority to influence Site activities to ensure that detrimental impacts on Site biodiversity are minimised in line with the recommendations provided below.
- 3.5.3 Should professional ecological advice be required at any time during construction, the appointed ECoW will be contacted.

3.6 Site Checks

- 3.6.1 To assess whether the management plan is being followed and the measures outlined in this plan are protecting the Site and the surrounding areas sufficiently, the Site will be inspected daily by the BC during construction.
- 3.6.2 To ensure the BC is confident that the proposed strategy and management plan is being followed and that the measures outlined in this plan are protecting the Site and surrounding

areas, the Site will be inspected by the ECoW as required throughout the construction period. Any activity considered attributable to wildlife which is identified within the Site during the construction period will be reported to the ECoW.

4 MANAGEMENT PRESCRIPTIONS AND WORKS METHODOLOGIES

4.1 Biodiversity Protection Zones

- 4.1.1 The construction area will be clearly demarcated prior to commencement of construction activities to protect the river and boundary habitats, and prevent accidental incursion (inclusive of tree Root Protection Areas (RPAs).

River Kennet

- 4.1.2 A 10m “biodiversity protection zone” will be erected between the River Kennet and the construction area using heras fencing (or similar). The biodiversity protection zone will be maintained and protected throughout the duration of construction and will serve to prevent accidental incursion during construction. To prevent impacts arising from dust, the fencing will be fitted with a fine mesh dust netting along the full length. For clarity, the biodiversity protection zone is shown on Figure 2. An example of the protection fencing is presented in Figure 3 and described further below:

- All barriers erected to protect retained vegetation will comprise HERAS (or similar) fencing with close-weave screening installed on the barrier to prevent dust deposition onto retained and adjacent habitats, as well as appropriate signage to inform site contractors it must not be moved without prior approval from the appointed ECoW and/or arboricultural consultant.
- The HERAS (or similar) fencing will be braced at appropriate intervals and secured in place. The fencing will be erected prior to occupation of the Site by the Project Manager and will only be removed once the construction phase is complete.
- No construction activities, including the storage of materials, will take place within the biodiversity protection zones.

Retained Boundary Vegetation

- 4.1.3 Retained boundary features (such as treelines and/or hedgerows) will be protected throughout the duration of construction in accordance with BS 5837:2012 Trees in relation to design, demolition and construction. Root protection fencing will be installed in line with the recommendations above.

4.2 Pollution Prevention and Control Measures

4.2.1 The River Kennet lies along the southern and eastern boundary of the Site. The river lies outside the Site boundary, therefore no direct loss of will occur. However, there is the potential for indirect effects during construction. Therefore, to ensure works do not indirectly impact the river, the appropriate protection measures are to be implemented throughout the construction phase of the proposed development.

4.2.2 Measures to be implemented by the contractor to avoid pollutants and hazardous materials (including fuels, oils, lubricants, paint and coating, adhesives and resins, solvents, compressed gasses, concrete, cements and binders) entering the River Kennet will conform to the best practice policy proposed by the Environment Agency (EA) via the Pollution Prevention Guidelines (PPGs). Although the guidelines were withdrawn in 2015, the key principles of the guidance remain relevant. These include:

- Planning and implementation of best practice construction methods to ensure debris, pollutants and any other materials do not enter the Ashdown Forest.
- The handling, use and storage of hazardous materials to be undertaken in line with the EA's Pollution Prevention Guidelines (e.g., PPG2 Above Ground Oil Storage Tanks).
- Construction of a formal Site compound and associated access in a location away from the boundaries of the designated sites, using existing areas of hardstanding and access roads.
- Suitable amounts of labour resource will be allocated to the project to ensure sufficient time and attention to keep the Site clean, therefore preventing ingress of debris into the wider landscape/woodland.
- Fuel and other potentially polluting chemicals to be stored in a secure impermeable storage area (on existing areas of hardstanding away from the boundaries of the designated sites).
- Refuelling and maintenance of vehicles and/or other machinery to be undertaken away from the Site.
- All equipment to be kept clean and in good working order, and fitted with drip trays, where appropriate. Drip trays to be present to collect leaks from diesel pumps or from standing plant.
- Spillage kits and oil absorbent material to be located within the Site at all times during construction.
- Secure Site to prevent vandalism events which could lead to pollution.

- An emergency response plan will be prepared. The emergency response plan will include (but not be limited to) chemical/fuel spillage, flood events, fire, explosions, structural collapse.
- All construction staff to be trained to respond to spillages, and how to use emergency response equipment.
- Discharges of water abstracted from excavations to be subject to off-site quality attenuation measures as required.
- Toolbox talks or other training to be provided to site staff on relevant site environmental issues to ensure precautionary working methods are adhered to.
- Site accommodation and waste collection tanks will be raised above the known flood risk level.
- An assessment of potential impact from construction works will be made in inclement weather and works stopped if the risk of sediment run-off is considered significant.
- Drainage channels and trenches constructed to facilitate Site drainage, if required, are to be designed to ensure that water and sediment does not enter the River Kennet.

4.2.3 Should alteration to the approved Site boundary be required, this will be conducted in consultation with the appointed ECoW.

4.3 Concrete and other Construction Debris

4.3.1 Concrete is highly alkaline, corrosive and can be a serious form of pollution on construction sites. Should this enter the River Kennet it could result in changes to water quality, and consequently cause reduction in species diversity. Similarly, dumping of construction materials (including sediment-forming construction products) could also result in impacts to water quality, quality of the aquatic and bankside vegetation and tree species, and species diversity. The following list details the measures that will be put in place to prevent pollution and will conform to the best practice policy proposed by the Environment Agency (EA) via the Pollution Prevention Guidelines (PPGs):

- Concrete and cement mixing and washing areas will be sited 10 metres from any surface water drain (or watercourse) to minimise the risk of run-off.
- Settlement and re-circulation systems for water re-use and a contained area for washing/cleaning concrete batching plant and/or ready-mix lorries.
- HERAS fencing, or similar, around the development boundary will also prevent accidental encroachment and dumping of hazardous materials.

- 'All surplus materials, debris and excess excavated spoil is to be removed from site promptly for licensed disposal or recycling / reuse where appropriate.

4.4 Air Quality

4.4.1 Air quality will be moderated throughout the development through application of the following traffic management principles:

- Delivery vehicles whenever practical will avoid 'peak public traffic hours' to reduce traffic congestion and nuisance to the existing road and highway network.
- To avoid construction traffic congestion and nuisance to the surrounding area all suppliers and contractors will be made aware of traffic routes.
- Site entrances will be maintained and kept clean and clear.
- All materials will be loaded within the Site compound/existing areas of hardstanding away from the boundaries of designated sites.
- Engines of all vehicles on-site are not left running unnecessarily.
- Plant will be well maintained, with routine servicing of plant and vehicles to be completed in accordance with the manufacturer's recommendations and records maintained for the work undertaken.
- All project vehicles, including off-road vehicles, will hold current MOT certificates, where applicable and where required due to the age of the vehicle and that they will comply with exhaust emission regulations for their class.

4.5 Dust Management

4.5.1 The application of standard dust control measures included in the British Research Establishment guidance (Building Research Establishment, 2003) are normal working practice on all professionally managed construction sites in the UK.

4.5.2 Standard measures which will be implemented for the duration of construction will include the following:

- Staff will be trained in the control of dust and will ensure the Site is monitored for levels of surface dust.
- Should dust build up this will be damped down with hosepipes.
- All dust and air quality complaints will be recorded, identifying cause(s), with appropriate measures taken (and recorded) to reduce emissions in a timely manner.
- The access road into and out of the Site will be monitored for excessive dust build up. Should surface dust build up, the road will be swept.

- The name and contact details of person(s) accountable for air quality and dust issues will be displayed on the Site boundary.
- There will be no bonfires and/or burning of waste materials within the Site.

4.6 Noise and Vibration

4.6.1 Noise and vibration will be controlled throughout the development through application of the below management principles:

- Before works on-site are commenced, all contractors should make available for inspection a method statement (in accordance with the principle described in BS 5228: 2009: Part 2: Code of practice for noise and vibration control on construction and open site) stating precisely the type of plant to be used and the proposed noise control methods.
- The contractors will also be required to comply with other relevant provisions of the Control of Pollution Act 1974.
- The contractor should also comply with the recommendations set out in BS 5228:1997 AMD 1 Code of practice for noise control on construction and demolition sites.
- Muffling should be in accordance with the recommendations set out in BS 5228:1997, Code of practice for noise control on construction and demolition sites:
 - Compressors should be fitted with properly lined and sealed acoustic covers, which should be kept closed whenever in use.
 - Pneumatic percussive tools should be fitted with mufflers or silencers of the type recommended by the manufacturers.
 - Machines in intermittent use should be shut down in the intervening periods between work or throttled down to a minimum.
 - Care should be taken when loading or unloading vehicles, dismantling scaffolding, or moving materials to reduce impact noise.
- Materials will be handled with care e.g., material will be placed rather than dropped.
- Drop heights of materials from lorries and other plant will be kept to a minimum.
- All plant used on-site, paying particular attention to the integrity of silencers and acoustic enclosures will be maintained in good and efficient working order and operated such that noise emissions are minimised as far as reasonably practicable.
- As far as reasonably practicable, any plant, equipment or items fitted with noise control equipment found to be defective should not be operated until repaired.

- Vehicles and mechanical plant, where reasonably practicable, will be fitted with effective exhaust silencers and will be maintained in good working order and operated in a manner such that noise emissions are controlled and limited as far as reasonably practicable.
- Machines in intermittent use should be shut down or throttled down to a minimum during periods between works.

4.7 Lighting Design Strategy for Biodiversity

- 4.7.1 To maintain the integrity of the surrounding habitats for nocturnal fauna, works will be limited to daylight hours only. No additional lighting will be installed within the Site. At any stage, should lighting required (e.g., for safety purposes), a sensitive lighting scheme will be carefully designed in consultation with lighting engineers in line with current good practice guidance from the [Bat Conservation Trust](#) and secured by planning condition.
- 4.7.2 Where practical, works will be limited to standard daytime hours and where works are required outside of this period, suitable screening will be installed to avoid light spill onto the retained boundary habitats. If deemed a requirement, the appointed ecologist will determine the appropriate screening type. Installation of the screening will be conducted by the on-site contractors and in consultation with the appointed ECoW.
- 4.7.3 In order to maintain these working hours, contractor(s) will require a period of 30 minutes before and at the end of the working shift to start up and close down the works activities. During the construction period it may be necessary in exceptional circumstances to work outside the prescribed working hours. Should this occur, the hours and duration of these works will be subject to consultation with Reading Borough Council.
- 4.7.4 If additional lighting for safety purposes is required, the ECoW will assess the lighting units, the positioning of the lighting and the light spill resulting from the lighting units prior to the commencement of construction works or at the time of installation should work have commenced.

5 REFERENCES

Action for River Kennet (2004). <https://www.riverkennet.org/about-the-river/birds>

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<https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>

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Greenspace Ecological Solutions (2019c). Bat Roost and Bat Activity Survey Report. (J20563_P4)

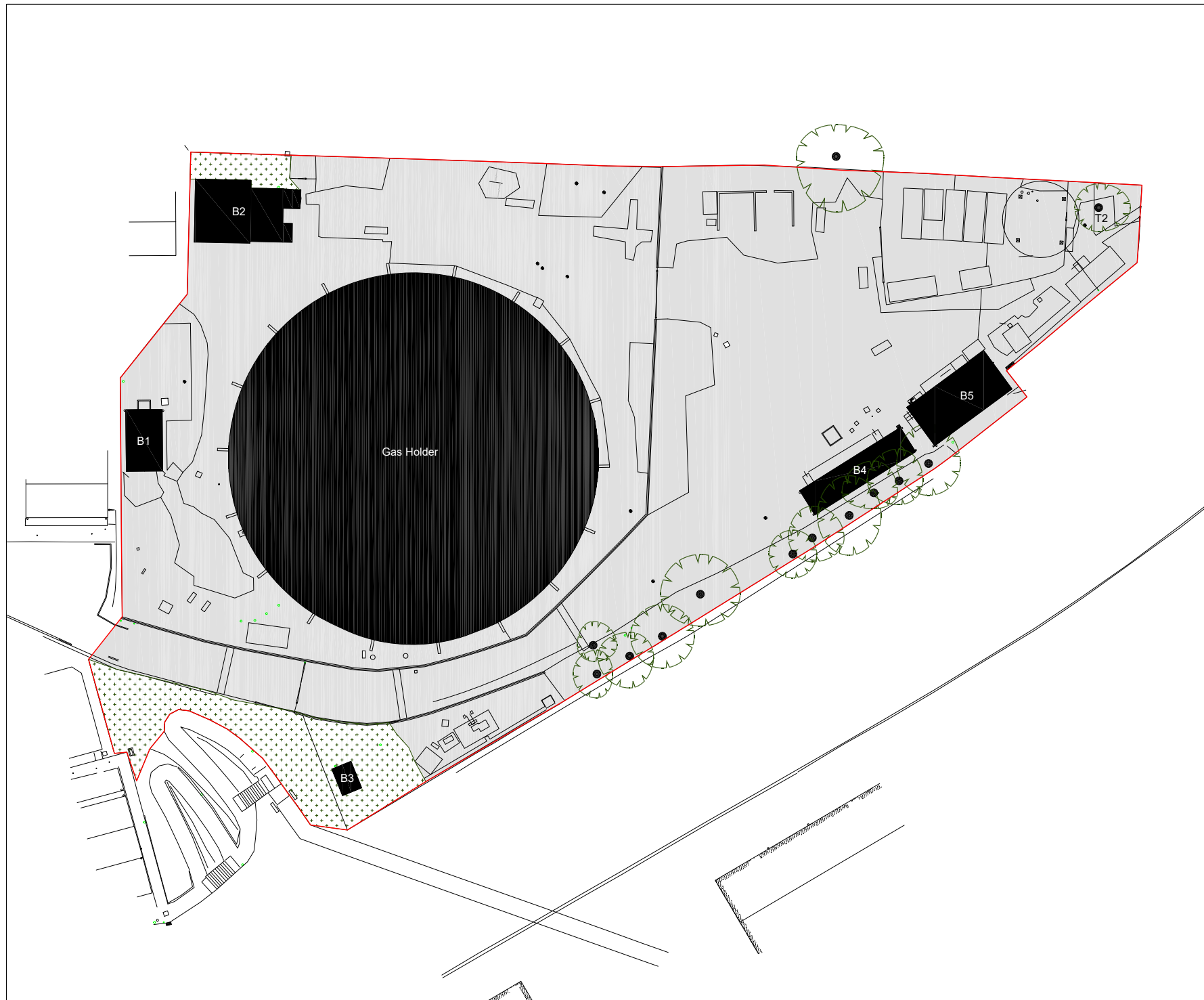
National Planning Policy Framework (NPPF) 2023. https://assets.publishing.service.gov.uk/media/65a11af7e8f5ec000f1f8c46/NPPF_December_2023.pdf

Natural Environment and Rural Communities (NERC) Act 2006. <http://www.legislation.gov.uk/ukpga/2006/16/contents>

The Conservation of Habitats and Species Regulations (Habitats Regulations) 2018. <http://www.legislation.gov.uk/uksi/2018/1307/contents/made>

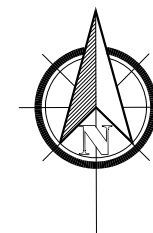
Wildlife and Countryside Act (as amended) 1981. <http://jncc.defra.gov.uk/page-1377>

Figures



Legend

-  Site Boundary
-  Hardstanding
-  Building
-  Scrub
-  Tree



Job Reference : J20563_P6

Project Title: Former Gas Holder Site

Drawing Title
Figure 1: Phase 1 Habitat Plan

Date : 21-09-18 Checked : GN

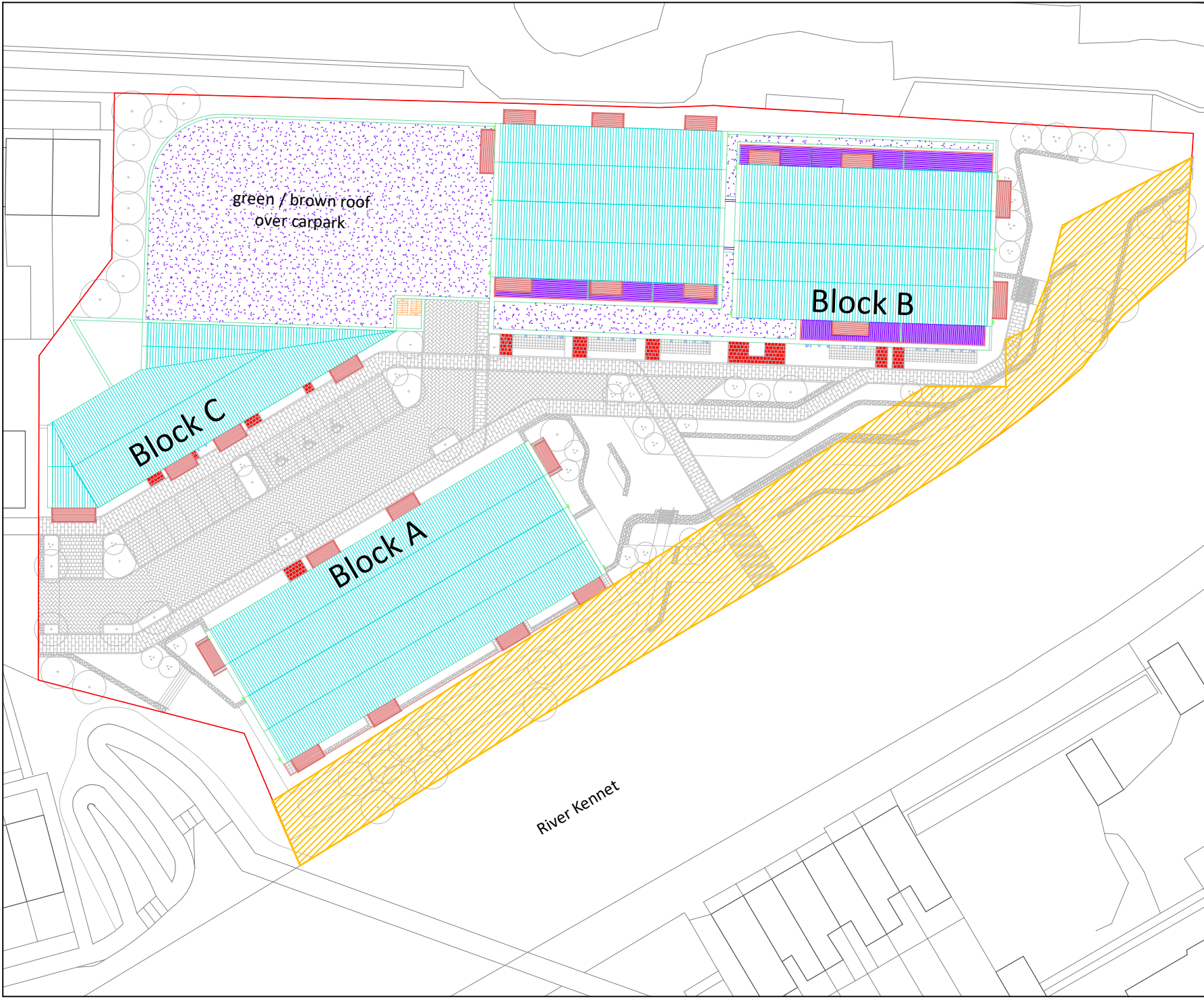
Drawn : JJ Approved : N/A

Status : Final Scale : NTS

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No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site. All measurements are for indicative purposes only.





Legend

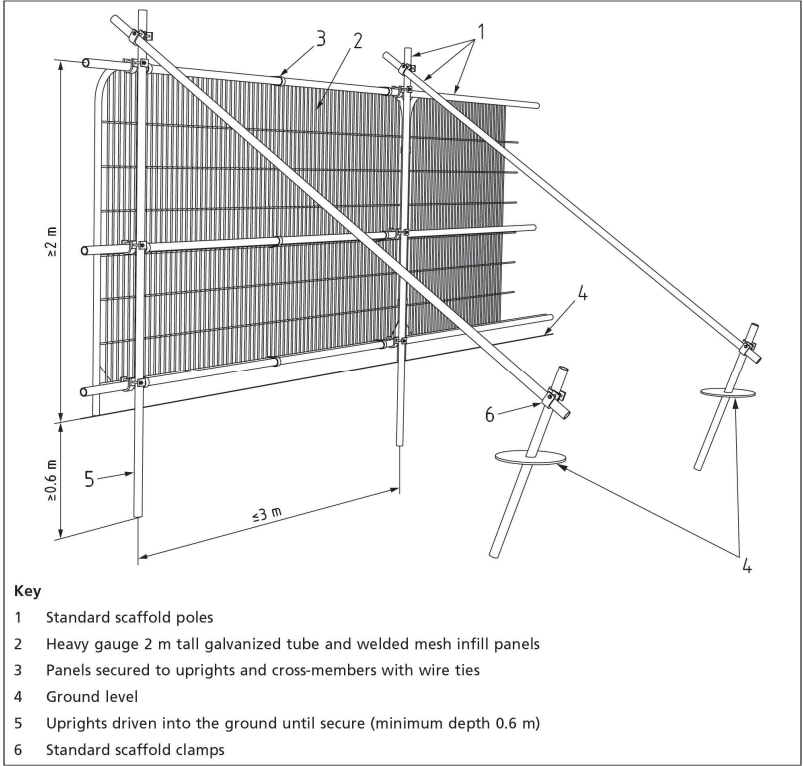
 10m Ecological Buffer Zone



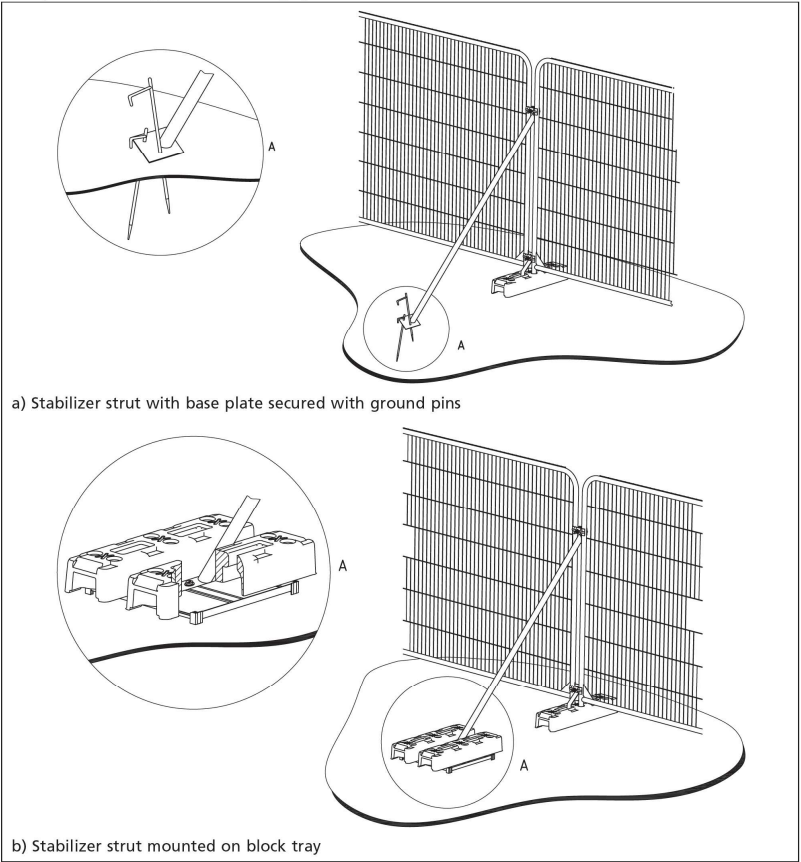
Job Reference : J20563_P6
Project Title: Former Gas Holder Site
Drawing Title
Figure 2: River Kennet Biodiversity Protection Zone
Date : 11/04/2024 Checked : LR
Drawn : HK Approved : CMB
Status : Final Scale : NTS

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All dimensions are to be checked on site. All measurements are for indicative purposes only.

Default specification for protective barrier



Examples of above-ground stabilizing systems



Job Reference : J20563_P6
Project Title: Former Gas Holder Site
Drawing Title
Figure 3: Tree Root Protection Measures
Date : 11/04/2024 Checked :
Drawn : HK Approved : N/A
Status : Final Scale : NTS