

Memo

To: Thomas Bradfield

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 31 October 2024

Re: Planning application ref: PL/24/1155

Address: JOHN LEWIS CUSTOMER COLLECTION POINT, CROSSLAND ROAD, READING, RG1 2HT

Description: Demolition of the existing building and redevelopment of the site comprising erection of a new building for up to 215 build to rent residential dwellings (Use Class C3) together with flexible commercial / community space (Use Class E/F1/F2), residents' facilities, landscaping, public realm, amenity space, cycle parking and disabled car parking

The application site comprises the former John Lewis warehouse on Crossland Road in central Reading. It is proposed to demolish this building and to erect a new residential building comprising over 200 build to rent flats together with communal landscaped areas.

The ecology Report (AECOM, August 2024) concludes that the site is not suitable for bats, reptiles, great crested newt, badgers or other protected species. Habitats on site comprise predominantly building and hardstanding with areas of introduced shrub and ten small trees (mostly along Mill Lane frontage). The trees and introduced shrub will be removed for the development and will be replaced by trees, hedging and biodiverse planting. There is therefore a low risk of impacts on nesting birds during vegetation clearance and commuting/foraging bats via external lighting, but both of these can be avoided or minimised via conditions – wording provided below.

Biodiversity Net Gain (BNG)

This application is subject to mandatory net gain requirements as outlined in Schedule 7A of the Town and Country Planning Act 1990.

A Biodiversity Net Gain assessment was conducted using the Statutory Biodiversity Metric (AECOM, August 2024) based on the Overall Landscape Plan (Camlins 2024, ref: SY743-000-0002).

The assessment results indicate that a 272.1% (0.82) net gain in habitat units and a net gain of 0.16 hedgerow units can be achieved. The baseline habitats appear to have been accurately accounted for in the Metric. Enhancements include 130m of nonnative and native hedgerow, approximately, 47 small trees, areas of grassland and shrubs and extensive brown roofs across the new buildings. Consequently, if planning permission is granted, it will be contingent on meeting the pre-commencement general biodiversity net gain condition. This condition requires the submission and approval of a Biodiversity Gain Plan, demonstrating how a 10% increase in biodiversity value will be achieved for the development – please see informative wording below.

Biodiversity Enhancements & Planting

The ecology report recommends a number of ecological enhancements. These include bee bricks,

log piles on the brown roofs and integrated bird and bat boxes. However, only 4 bat boxes and 12 bird boxes have been recommended across the whole development. This is insufficient for a development of this scale. The applicant is asked to supply details, locations, elevations and specifications, for at least 15 of each type of box to be integrated into the building. Bird boxes should include swift bricks or universal nesting boxes (– see https://www.swift-conservation.org/universal_swift_nest_brick02.pdf) to support the local swift population established in this area.

Planting:

The Landscape Strategy includes Indicative Plant Lists and Calendar. Currently, none of the proposed plantings are native species. The applicant should revise the list to ensure that at least 50% of the plant selections are native and support local wildlife.

Should the application be approved, it is recommended that a condition be set to ensure that full details of these enhancements for wildlife are provided – example wording provided below.

Lighting:

Although the site is in central Reading and surrounded by buildings and roads, there are several bat roosts in the area and we have numerous observations of bats, likely due to suitable nearby bat foraging habitats such as the River Kennet. An increase in artificial light at night significantly harm wildlife, likely contributing to recent declines in invertebrate populations and diversity. It disrupts the life cycle of invertebrates, bats, birds and other wildlife.

As lighting has become more affordable and accessible, there is often a tendency to install excessive lighting around new developments. Therefore, a condition should be set to ensure that a wildlife friendly lighting scheme is provided. This is particularly important near the new bird and bat boxes as well as along the site boundaries and newly vegetated areas, which should remain dark and unlit. Wording is provided below.

Conditions:

Condition: Prior to the commencement of the development hereby approved, a specification (including methodology and programme of implementation) for the enhancement of biodiversity through the provision of features including a minimum of 15 integral bat and 15 bird boxes and native and wildlife friendly landscaping (to accord with any landscaping/BNG plans), shall be submitted to and approved in writing by the Local Planning Authority. The works so approved, shall be carried out in accordance with the approved programme of implementation and shall be completed before the first dwelling is occupied. Prior to first occupation of the first dwelling the development shall be inspected by a qualified ecologist and a statement of conformity shall be submitted to the Local Planning Authority to confirm whether all of the measures for enhancing biodiversity have been implemented in accordance with the details approved under this condition.

Reason: To incorporate biodiversity in and around developments in accordance with paragraph 186 of the NPPF

Condition: All works are to be carried out outside of the bird-nesting season (March – August inclusive) or if this is not practicable, a suitably qualified ecologist will survey the building prior within 48 hours of the commencement of works and advise whether nesting birds are present. If active nests are recorded, works that may disturb any disturb active nest shall not proceed until the nest is no longer occupied.

Reason: To ensure that wildlife is not adversely affected by the proposed development in line with and wildlife legislation

Condition: The development hereby permitted shall not be occupied until a report detailing the external lighting scheme and how this will not adversely impact upon wildlife has been submitted

to and approved in writing by the LPA. The report shall include the following figures and appendices:

- A layout plan with beam orientation
- A schedule of equipment
- Measures to avoid glare
- An isolux contour map showing light spillage to 1 lux.

The approved lighting plan shall thereafter be implemented as agreed.

Reason: To limit the impact of light pollution from artificial light on nature conservation in accordance with para 191 of the NPPF

Please note:

Informative:

Please note that this permission is has been granted subject to the statutory condition ("the biodiversity gain condition") that development may not begin unless:

(a) a Biodiversity Gain Plan has been submitted to the planning authority, and

(b) the planning authority has approved the plan.

Failure to submit a Biodiversity Gain Plan prior to the commencement of development is a breach of planning consent and may lead to formal enforcement action being taken that will require all development on site to cease.

You should ensure that works do not commence until Biodiversity Gain Plan has been submitted to and approved in writing by the council and "the biodiversity gain condition" has been discharged.