

Our ref: 1006555/ES/DS/007 let (condition 26, 27 & 35)

15th March 2024

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To Whom it May Concern,

DEE ROAD FIRE STATION, DEE ROAD, READING, BERKS, RG30 4FS– RESPONSE TO CONDITIONS 26, 27, and 35 (PLANNING REF. 221130)

As you are aware, the above approved full planning permission is subject to a number of conditions relevant to ecology, of which are set out below, along with specific feedback provided by the LPA, and subsequent action and response by Aspect Ecology;

Condition 26 states – ‘No development hereby permitted shall commence on site above foundation level (except demolition) until details of a habitat enhancement scheme, to include locations and elevations of twenty integrated bat boxes and fifteen integrated bird boxes, tiles or bricks on and around the new buildings has been submitted to and approved in writing by the Local Planning Authority.

The approved scheme shall include a timetable for implementation and a scheme of ongoing maintenance. The habitat enhancement scheme shall be implemented in accordance with the approved scheme and maintained in accordance with the approved scheme at all time thereafter.’

LPA comments received 13.11.23	Aspect Ecology Response and Actions
<i>‘The applicant has submitted two plans (Aspect Ecology ref 6555/ECO5 & 6555/ECO4) showing the elevations and locations of 22 bird boxes, 20 bat boxes and numerous hedgehog tunnels. The bat and bird boxes will be integrated into the buildings. The documents don’t appear to supply any details of maintenance or a timetable for implementation of the biodiversity enhancements however, and until details on this aspect of the condition are supplied, it is recommended that the condition is not discharged.’</i>	The Biodiversity Enhancement Plan has now been amended to reflect the requirement for maintenance details, which are minimal, as well as a timetable for implementation. Furthermore, a number of Hedgehog Cut-out locations have been adjusted to maximise permeability of the site to Hedgehog under the scheme design. The provision of such details should now be sufficient to fully discharge Condition 26.

Condition 27 states – ‘No demolition of buildings on site shall commence until a licence for development works affecting bats has been obtained from the Statutory Nature Conservation Organisation (Natural England) and a copy has been submitted to the council. Thereafter mitigation measures approved in the licence shall be carried out and thereafter maintained in accordance with the terms of the licence. In the event that a licence for development works affecting bats is not required the applicant shall submit a report to the Local Planning Authority detailing the reasons for this and no demolition works shall be carried out until the report has been approved in writing by the Local Planning Authority.’



LPA comments received 13.11.23	Aspect Ecology Response and Actions
<i>'The applicant has submitted a Natural England bat mitigation licence ref: 2023-65166-EPS-MIT with this application which allows "Licensable activities associated with development works consented under reference number 220461." to be legally carried out. The requirement to submit the licence to the council has therefore been complied with. To fully comply with the condition the applicant will need to ensure that they install the bat mitigation measures specified in the licence.'</i>	The licensable works, including pre-commencement check, installation of mitigation bat box on suitable retained tree, and subsequent destructive search exercise have now been completed. The pre-commencement check and installation of mitigation box were undertaken on the 8 th August 2023, with the destructive search completed on the 18 th October 2023. No roosting bats were intercepted during the course of the pre-commencement check and destructive search exercise, and the mitigation box will remain in place for the lifetime of the development. Accordingly, Condition 27 should now be fully discharged.

Condition 35 states – *'No development hereby permitted shall commence on site above foundation level until details of external street lighting to be provided within the site have been submitted to and approved in writing by the Local Planning Authority. The details shall include a timetable for provision of all lighting and:*

- *A layout plan with beam orientation*
- *A schedule of equipment*
- *Measures to avoid glare*
- *An Isolux contour map showing light spillage to 1lux.*
- *Additional measures to limit the impact on wildlife. The approved lighting plan shall thereafter be fully implemented in accordance with the approved details and timetable and shall be retained and maintained as approved at all times thereafter.'*

LPA comments received 13.11.23
<i>'The applicant has submitted a plan entitled Private Street Lighting Design (MMA Lighting Consultancy, dated 30/9/2023) This shows the street lighting to be installed on site along with light spillage contours.</i> <i>The drawing should be prepared alongside proposed landscaping plans and locations of all biodiversity enhancements. The current plan shows high levels of light (over 1 lux) over existing and potential proposed trees. These levels of light are too high over and around the trees which will reduce their value to wildlife. The plan also includes the following statement which currently is unacceptable and will need to be clarified: "ANY EXISTING OR PROPOSED TREES ARE TO BE CUTBACK, REMOVED OR RELOCATED TO AVOID INTERFERENCE WITH THE STREET LIGHTING LUMINAIRE OR PREVENT ANY FUTURE MAINTENANCE."</i> <i>Furthermore, the covering letter provided by MMA Lighting Consultancy Ltd does not appear to refer to the following as required by the condition: The details shall include a timetable for provision of all lighting and: • A layout plan with beam orientation • Measures to avoid glare. • Additional measures to limit the impact on wildlife. Currently the plans are not acceptable, and it is our advice that the condition should not be discharged until the above issues are addressed and a lighting plan is provided that has been designed in conjunction with the proposed landscaping, biodiversity enhancement plans and existing vegetation/trees.'</i>
Aspect Ecology Response and Actions
Aspect Ecology and MMA Lighting have reviewed the above commentary in conjunction with the Biodiversity Enhancement Plan and Lighting Plans previously submitted. Consensus has now been met on the additional measures required to minimise lighting impacts on the proposed ecological enhancements and retained / proposed landscaping, by way of glare and light spill reduction methods (as shown within the updated Environmental Impact Assessment and Lighting Design Category Selection Process (MMA Lighting Consultancy Ltd, March 2024, Ref: MMA18023 R3). It is considered that allowances should be made, given the urban nature of the site, to accept that the ecological value of the site, particularly in terms of bat roosting and bird nesting opportunities, as being improved well above that of the pre-development condition of the site. Again, given the urban location of the site, and as demonstrated by the findings of the Ecological Appraisal Phase 1 habitat survey, desk study exercise and subsequent comprehensive bat survey work, the limited bird and bat species recorded on site are



relatively light-tolerant, such that further requirements to limit light spill / glare are onerous, particularly for a site which holds limited ecological interest in the first instance.

The following statement has now been removed from the lighting plan *"ANY EXISTING OR PROPOSED TREES ARE TO BE CUTBACK, REMOVED OR RELOCATED TO AVOID INTERFERENCE WITH THE STREET LIGHTING LUMINAIRE OR PREVENT ANY FUTURE MAINTENANCE."*. Subject to clarification from MMA Lighting on timetabling for lighting provision, Aspect Ecology has no reservations on Condition 35 being discharged.

Should you have any queries regarding the above, please do not hesitate to contact us.

Yours sincerely,



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