

Memo

To: Anthony Scholes

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 17 July 2025

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 170 build to rent residential dwellings (Use Class C3) together with flexible community space (Use Class F1/F2), residents' facilities, landscaping, public realm, amenity space and cycle parking. (Amended description)

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 170 build to rent flats together with communal landscaped areas. This is a reduced number of flats (was 215)

Effect of development on wildlife

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

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

An updated Biodiversity Net Gain assessment was conducted using the Statutory Biodiversity Metric (AECOM, July 2025) based on the updated General Arrangement - Public Realm and Landscape (Camlins 2025, ref: SY743-275-0001).

The assessment results indicate that a 328.05% (0.97) net gain in habitat units and a net gain of 0.42 hedgerow units can be achieved – an increase on previously submitted plans. The baseline habitats appear to have been accurately accounted for in the Metric. Enhancements include 210m of nonnative and native hedgerow, 50 small urban trees, green wall, areas of grassland, planters and shrubs and extensive brown roofs across all 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 Landscape and Ecology Management Plan (AECOM. July 2025) includes details of ecological enhancements across the site.

The document shows the location of 15 bat boxes and 15 bird boxes to be installed. In the first application for the site, the proposed provision was only 4 bat boxes and 12 bird boxes. a minimum of 15 bird and bat boxes was recommended which appear to have been provided in the latest plans.

However, although the development has now been reduced to 170 dwellings, the original recommendation of 15 boxes represented a bare minimum.

With the latest NPPF (2024) specifically highlighting the importance of incorporating swift nesting sites in new developments to help reverse the population decline of this species, it would appear that providing only 15 boxes on a 170 flat development falls short of the aims of this policy.

Furthermore, current best practice (British Standards 42021:2022 - *Integral nest boxes – selection and installation for new developments* – as well as guidance from the RSPB) recommends a greater number of bird boxes on new developments. As such, while the inclusion of swift boxes is welcome, the current provision needs to be revised upwards to support local biodiversity and the document updated accordingly.

With regards to bat boxes, the proposed provision of the 15 bat boxes is probably just about acceptable given best practice guidance from the BCT which recommends on bat boxes for every 5 to 10 dwellings on new residential developments.

Furthermore, please can the following statements be clarified/corrected :

- (a) Table 4.2 Site Objectives and Actions states: Installation of a minimum of 15 insect boxes or refugia within or adjacent to the soft landscaping – see section 5.6 . However section 5.6 refers to only 12 boxe and the landscape plan also shows only 12
- (b) The document states “Integrated bat tubes will be installed on the façade of the buildings in the general locations as shown in o.” What is o?

Planting:

The updated plans show a much increased native planting which is welcome as well as extensive biodiverse brown roofs and a length of green wall on the border to the south of the site.

Lighting:

Although the site is located 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. Any increase in artificial light at night significantly harm wildlife including bats and is also likely to be contributing to recent declines in invertebrate populations and diversity.

The original plans showed the lighting across the site and it appears that most of the lights will be at a colour temperature of 3000k . Is there a reason why the lighting colour temperature cannot be reduced across the site to 2700k? Lights at 2700k are recognised as more wildlife friendly and far less disruptive to nocturnal species.

These luminaires proposed also include uplighting on a number of the new trees which appear to be spike mounted spotlights aimed at the base of the tree canopy i.e. uplighters. The lighting strategy states that “*This lighting treatment is proposed to be on a time clock to minimise disturbance to residents and tree leaf cycles*”. However such lights are likely to prevent birds from

occupying the trees at roosting time and will reduce their value to wildlife. These uplighters should be removed or redirected to avoid light spill onto the tree canopy. We would also need confirmation that the bird and bat boxes are not subject to excessive lighting i.e. they are located in areas that remain sufficiently dark at night

The lighting plan should be reviewed and updated to reflect best practice guidance for reducing ecological impacts on local wildlife

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 integral bat and 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 clearance and demolition 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 (including the biodiversity enhancements proposed) 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

IMPORTANT - 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.