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24th January 2026

Ref: Ecological Enhancements at 85 Pell Street, Reading.

To whom it may concern,

The Ecology Co-op has been commissioned by HS Design London to discharge condition no. 16 of the planning application PL/20/1757 (25/1734), which pertains to the demolition of an existing disused salvage yard and the construction of a replacement building to provide 4 no. 1 bedroom units and 1 no. 2 bedroom house together with associated landscaping, cycle and bin stores.

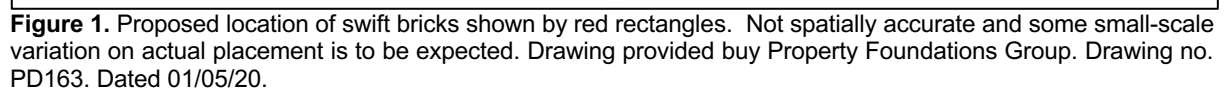
'No development shall commence on site until details of biodiversity enhancements, to include a minimum of 4 swift bricks built into the walls of the new building and native and wildlife friendly landscaping (including gaps at the bases of fences to allow hedgehogs to traverse through the gardens), have been submitted to and approved in writing by the Local Planning Authority. The biodiversity enhancements shall thereafter be installed as approved and prior to occupation of the development a letter from a suitably qualified ecologist with photos of the bricks in situ shall be submitted to and approved in writing by the Local Planning Authority'.

The purpose of this letter report is to provide advice on the installation of all ecological features, including specification of swift bricks, specification and location of hedgehog cutouts as well as advice on native planting schemes.

The site is situated in the urban town of Reading within a heavily developed area, with residential land use in the immediate surroundings. The central grid reference for the site is SU 71650 72820.

Swift bricks

Swift bricks should ideally be placed at a height of 5m on the building and should be a minimum of 4m high. Areas of the building that receive high levels of sunshine should be avoided. They should also be placed in areas with free flight paths, not blocked by any vegetation. They should be placed 50-100cm away from each other when placed onto the same face. See Figure 1 below for recommended locations. In-situ examples of swift bricks can be found in Appendix 1.



Hedgehog cutouts can vary widely, however, generally they should be at least 13cmx13cm as recommended by The Wildlife Trusts. Cutouts should be placed at the bottom of fence panels; they can either be simple cutouts to the specification, or pipes can be used to try and deter cats. Examples of cutouts can be found in Appendix 1. In addition to cutouts, the development would be encouraged to add a hedgehog house – the area proposed for hedgerow creation would provide suitable refuge. While eventually the hedgerow species would completely cover the hedgehog house, this will help replicate natural resting places and will also help provide shelter and protection from predators such as from domestic cats. The cutouts should be placed on the north and the south of the eastern garden area to allow free movement into neighbouring gardens, as well as between the two central amenity spaces.



Figure 2. Hedgehog cutouts illustrated by red lines. Not spatially accurate to the provided plan and locations are meant to be used as guide. Proposed hedgehog house location illustrated by a blue square.

Landscaping Recommendations

Hedging

Where possible, all planting should include a variety of native species to provide a variation of food sources throughout the year for a variety of species.

Where screening is an important consideration, such as the central hedgerow dividing the two amenity areas, species like yew *Taxus bacata*, juniper *Juniperus communis* and holly *Illex aquifolium* provide evergreen native shrubs and should be used over non-native species.

The wider area of proposed hedging to the east should aim for higher species composition, with at least five native woody species used. The following species have been recommended as they will provide good sources of food throughout the majority of the year. Incorporating thorny species will also provide nesting places for breeding birds that help reduce the pressure from domestic cats.

- hawthorn *Crataegus monogyna*
- blackthorn *Prunus spinosa*
- hazel *Corylus avellana*
- crab apple *Malus sylvestris*
- wild privet *Ligustrum vulgare*
- dogwood *Cornus sanguinea*
- field maple *Acer campstre*.

As well as thorny species, incorporating climbers into the hedgerow will further the species diversity and the value for wildlife. Species such as honeysuckle *Lonicera periclymenum* and travelers joy *Clematis vitibla* should be used to provide seed sources for birds and pollen sources for invertebrates such as moths and butterflies.

Wildflowers area

As well as native hedging, the development should incorporate native wildflower planting as part of the landscaping.

A 1-2m strip of wildflowers is recommended around the western and northern edge of the communal amenity space.

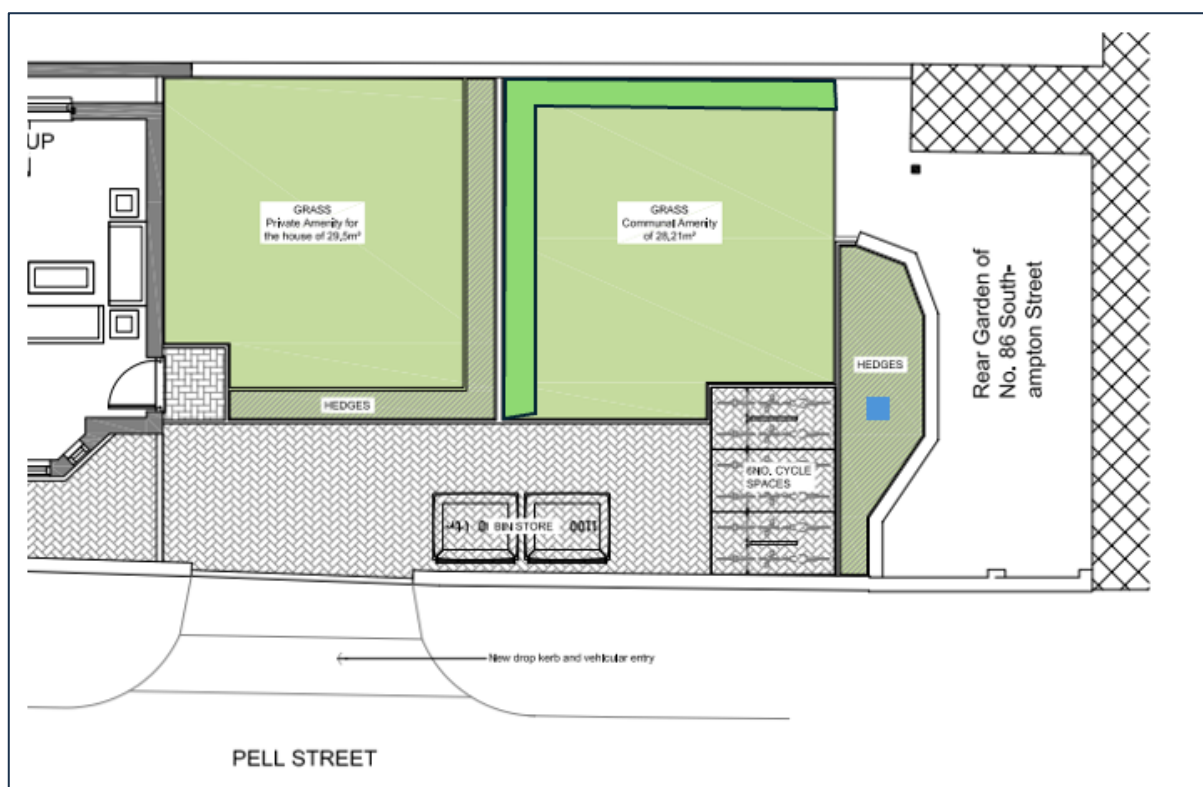


Figure 3. Area of proposed wildflower strip illustrated by green boxed area around the western and northern edge of the communal amenity area.

Any existing vegetation/grassland should be removed using a rotovator where necessary.

Bare soil should be scarified with disc harrows immediately prior to seed spreading.

Seeds should be harvested or sought from a local donor site, taking care not to over-harvest and deplete the donor site. If this is not possible, seeds should be bought from a reputable seller and from local provenance such as <https://wildseed.co.uk/>. If seeds are being bought from a seller, it is important to get a complete mixture made up of forbes and grasses.

A recommended mixture from the above seller is EM3. This meadow mixture contains a very wide range of species. It may be used to create a very diverse sward where conditions vary across a site. It is also useful in situations where precise soil and site characteristics have not been established before sowing.

Seeds should be sown in September or early October at roughly 4g per m². Seeds should not be incorporated or covered after sowing but should be firmed in with a roller or 'treading in' to create good seed to ground contact.

Management

As part of on-going management, the wildflower habitat should be cut and gathered each year to a height of approximately 40–60mm after flowering in July and August. This process can be carried out through strimming. This is important to ensure that species diversity of the area is maintained, and grass species do not become dominant. Where necessary, a second cut could be taken in March each year if the sward is growing too coarsely. The grassland should not be cut between the 1st of April and mid-August so that plants are given the opportunity to flower.

Adaptive management will need to be applied, especially throughout the first five years where site conditions may take time to become favourable for wildflower meadow creation. It is likely for the first three to five years, two cut and collects, one in April and one late summer cut, will be required to help control grass growth.

Once established, the wildflower area will require little management beyond one cut and collect a year.

Conclusions

The above recommendations, if implemented in full, will provide sufficient enchantments to discharge condition No. 16.

If you have any queries about the findings of this assessment, then please do not hesitate to contact me.

Kind regards,

A handwritten signature in black ink, appearing to be 'James Whitby', with a stylized, cursive script.

James Whitby

MSc, ACIEEM,

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Email: james@ecologyco-op.co.uk

APPENDIX 1 – Figures



Figure 1. An example of a swift box in-situ. Taken from nhbs.com.

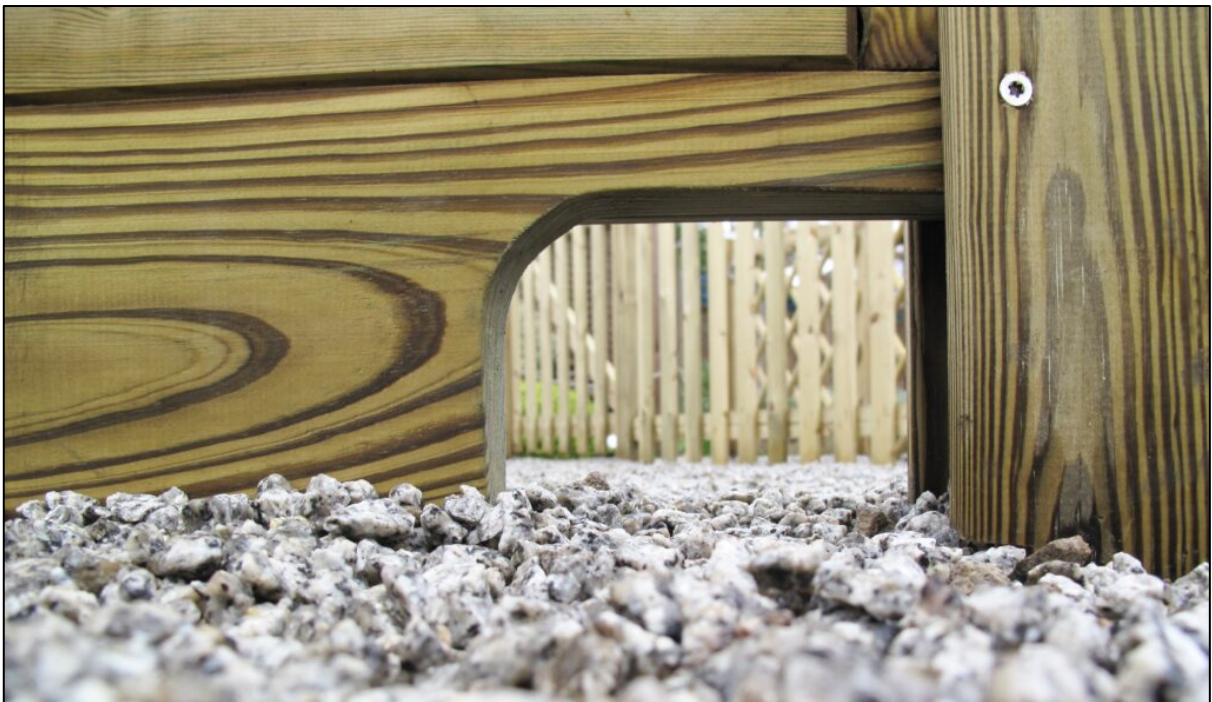


Figure 2. An example of a hedgehog cutout. Taken from hedgehogstreet.org.



Figure 3. Example of a wildflower strip in a communal space. Taken from wocogaga.blogspot.com.

APPENDIX 2 – Reducing Impacts of Artificial Light

Bright external lighting can have a detrimental impact upon foraging and commuting bat flight paths, but more importantly can also cause bats to remain in their roosts for longer. Artificial lighting can also cause significant impacts to other nocturnal species, most notably moths and other nocturnal insects. It can also result in disruption of the circadian rhythms of birds, reducing their fitness.

Guidelines issued by the Bat Conservation Trust¹ should be referred to when designing the lighting scheme. Note that lighting designs in very sensitive areas should be created with consultation from an ecologist and using up-to-date bat activity data where possible. The guidance contains techniques that can be used on all sites, whether a small domestic project or larger mixed-use, commercial or infrastructure development. This includes the following measures:

Avoid lighting key habitats and features altogether

There is no legal duty requiring any place to be lit. British Standards and other policy documents allow for deviation from their own guidance where there are significant ecological/environmental reasons for doing so. It is acknowledged that in certain situations lighting is critical in maintaining safety, such as some industrial sites with 24-hour operation; however, in the public realm, while lighting can increase the perception of safety and security, measurable benefits can be subjective. Consequently, lighting design should be flexible and be able to fully consider the presence of protected species.

Apply mitigation methods to reduce lighting to agreed limits in other sensitive locations – lighting design considerations

Where bat habitats and features are considered to be of lower importance or sensitivity to illumination, the need to provide lighting may outweigh the needs of bats. Consequently, a balance between a reduced lighting level appropriate to the ecological importance of each feature and species, and the lighting objectives for that area will need to be achieved. The following are techniques which have been successfully used on projects and are often used in combination for best results:

- dark buffers, illuminance limits and zonation;
- sensitive site configuration, whereby the location, orientation and height of newly built structures and hard standing can have a considerable impact on light spill;
- consideration of the design of the light and fittings, whereby the spread of light is minimised ensuring that only the task area is lit. Flat cut-off lanterns or accessories should be used to shield or direct light to where it is required. Consideration should be given to the height of lighting columns. It should be noted that a lower mounting height is not always better. A lower mounting height can create more light-spill or require more columns. Column height should be carefully considered to balance task and mitigation measures. Consider no lighting solutions where possible such as white lining, good signage, and LED cat's eyes. For example, light only high-risk stretches of roads, such as crossings and junctions, allowing headlights to provide any necessary illumination at other times;
- screening, whereby light spill can be successfully screened through soft landscaping and the installation of walls, fences and bunding;
- glazing treatments, whereby glazing should be restricted or redesigned wherever the ecologist and lighting professional determine there is a likely significant effect upon key bat habitat and features;
- creation of alternative valuable bat habitat on site, whereby additional or alternative bat flightpaths, commuting habitat or foraging habitat could result in appropriate compensation for any such habitat being lost to the development;
- dimming and part-night lighting. Depending on the pattern of bat activity across the key features

¹ Bat Conservation Trust and Institute for Lighting Professionals (2018) Guidance note 8. Bats and Artificial Lighting. <https://www.theilp.org.uk/documents/guidance-note-8-bats-and-artificial-lighting/>

identified on site it may be appropriate for an element of on-site lighting to be controlled either diurnally, seasonally or according to human activity. A control management system can be used to dim (typically to 25% or less) or turn off groups of lights when not in use.

Demonstrate compliance with illuminance limits and buffers

- *Design and pre-planning phase*; it may be necessary to demonstrate that the proposed lighting will comply with any agreed light-limitation or screening measures set as a result of your ecologist's recommendations and evaluation. This is especially likely to be requested if planning permission is required.
- *Baseline and post-completion light monitoring surveys*; baseline, pre-development lighting surveys may be useful where existing on or off-site lighting is suspected to be acting on key habitats and features and so may prevent the agreed or modelled illuminance limits being achieved.
- *Post-construction/operational phase compliance-checking*; as a condition of planning, post-completion lighting surveys by a suitably qualified person should be undertaken and a report produced for the local planning authority to confirm compliance. Any form of non-compliance must be clearly reported, and remedial measures outlined. Ongoing monitoring may be necessary, especially for systems with automated lighting/dimming or physical screening solutions.

Lighting Fixture Specifications

The Bat Conservation Trust recommends the following specifications for lighting on developments to prevent disturbance:

- lighting spectra: peak wavelength >550nm
- colour temperature: <2700k (warm)
- reduction in light intensity
- minimal UV emitted
- upward light ratio of 0% and good optical control.

Further reading:

Buglife (2011) A review of the impact of artificial light on invertebrates.

Royal Commission on Environmental Pollution (2009) Artificial light in the environment. HMSO, London. Available at: <https://www.gov.uk/government/publications/artificial-light-in-the-environment>

Rich, C., Longcore, T., Eds. (2005) Ecological Consequences of Artificial Night Lighting. Island Press. ISBN 9781559631297.

CPRE (2014) Shedding Light: A survey of local authority approaches to lighting in England. Available at: <http://www.cpre.org.uk/resources/countryside/dark-skies/item/3608-shedding-light>

Planning Practice Guidance guidance (2014) When is light pollution relevant to planning? Available at: <https://www.gov.uk/guidance/light-pollution>

Institution of Lighting Professionals (2021) Guidance Notes for the Reduction of Obtrusive Light GN01:2011. Available at: <https://www.theilp.org.uk/resources/free-resources/>

Voigt, C.C., Azam, C., Dekker, J., Ferguson, J., Fritze, M., Gazaryan, S., Hölker, F., Jones, G., Leader, N., Lewanzik, D. and Limpens, H., 2018. *Guidelines for consideration of bats in lighting projects*. Unep/Eurobats. Available at:

