

Memo

To: Anthony Scholes

From: Cathy Holwill (RBC Ecology Consultations)

CC:

Date: 10 April 2026

Re: Planning application ref: PL/26/0237

Address: BATTLE INN PH, 2 BEDFORD ROAD, READING, RG1 7HS

Description: Demolition of the former public house and the erection of a part five-storey building comprising six self-contained residential flats (Use Class C3) with a Commercial, Business and Service unit at ground floor (Use Class E) and associated works.

The application site is a derelict pub which will be replaced by a five storey block of flats with a ground floor commercial unit. The site is located close to the town centre in a built up area of the Oxford Road.

Effect of development on wildlife

The site is predominantly hardstanding, and the ecology report (Jonty Denton, February 2026) concludes that the building is unlikely to host roosting bats or other protected species and as such there would be no ecological objections to the proposals.

The bat survey results are broadly in keeping with a previous survey undertaken for an earlier application on the site. However, there are several inconsistencies within the report which undermine the quality of the submission which will need to be addressed:

- a. The report initially states that the proposal is for demolition of the existing building and replacement with a block of flats on the same footprint. However, a later section refers to "site for the extension" which is inconsistent with the description of the development.
- b. The postcode of the site given as RG4 7DS however, elsewhere in the report this is provided as RG1 7HS.
- c. There are a number of typos within the report – for example. "principle importance" should read "principal importance" and "...but ity is good building practice ..." should presumably read "it is good practice"
- d. The report notes that the site lies within a Nitrate Vulnerable Zone but there is no further reference is made to this designation. Given the densely urban nature of the site, it is not clear whether this is relevant to this assessment and clarification or maybe removal of this statement may be appropriate

The final report should be provided as a PDF file and not a Word document which can be easily edited.

Once the above issues have been addressed, there are likely to be no objections to the application. The DAS references enhancements in the ecology report "applicant confirms that any

recommended mitigation or enhancement measures identified within the ecological report will be implemented as required". However, it is noted that the ecological report does not include any such recommendations for biodiversity enhancements which would normally be expected.

As such, should planning permission be granted, it is recommended that a native and friendly landscaping scheme, integrated bird and bat boxes are secured by condition to enhance biodiversity on the site.

Example wording for such a condition is provided below.

Biodiversity Net Gain (BNG)

The application form states that the application is subject to the Biodiversity Net Gain condition. However, as there appear to be no habitats on the site, this statement would seem unlikely. Nonetheless a BNG metric has been provided filled in by Dr Jonty Denton which concludes that the site has no biodiversity value. It is unclear therefore why this assessment has been undertaken. To clarify, as less than 25m² of habitat would be affected by the proposals, the site would not be subject to BNG requirements

Condition

Condition: Prior to commencement of the development (excluding demolition and site preparation), details of biodiversity enhancements, to include bird and bat boxes, bricks or tiles built into the walls of the new buildings and proposals for native and wildlife friendly landscaping, shall be submitted and approved in writing by the council. All bird and bat boxes should be installed in accordance with British Standard BS 42021:2022, and the submitted details shall include specification, location, installation details and monitoring and maintenance arrangements in line with BS: 42021:2022.

Prior to first occupation, a brief letter report shall be submitted and approved in writing by the Council, confirming that the approved biodiversity measures have been installed. The report will include photographs of the features in situ and a simple plan showing their location

Reason: To incorporate biodiversity improvements in and around developments in accordance with paragraph 193 of the NPPF