

**St Mary's House
St Mary's Butts
Reading**

Report for:
V Goldstein
119 High Road
Loughton
Essex
IG10 4LT

INTRODUCTION

Overview

AA Environmental Limited (AAe) was instructed by V Goldstein to carry out an ecological survey of the above site. The purpose of the survey was to determine the existence and location of any ecologically valuable areas and to record any evidence of protected species, in particular bats. This information will serve to assess the ecological impact of the proposals and identify any ecological constraints and/or mitigation measures that may be required. A series of photographs has been attached for reference.

Planning was granted for the previous redevelopment proposals (change of use of first to third floors from office (Class E) to provide 31 serviced apartments (class C1) and addition of fourth floor to provide 6 serviced apartments (class C1))¹. The revised application is to increase the number of serviced apartment units from 37 to 41. There are no changes to the exterior of the proposed extant consent.

METHODOLOGY

Baseline Data

Baseline ecological data was obtained from Thames Valley Environmental Records Centre (TVERC) for the site and a 1 km study area. In addition, as certain baseline data is now readily available on the internet, the Multi-agency website (www.magic.defra.gov.uk) was consulted to determine whether any part of the site or nearby habitats have been statutorily or otherwise designated and a review of Google Earth's satellite imagery (http://www.google.co.uk/intl/en_uk/earth/index.html) was completed to determine past land uses of the site and surrounding land.

Walk-over Site Survey

The ecological walk-over survey was completed on Thursday 26 September 2024. During the walk-over survey, particular attention was paid to record the presence of bats that may be using the site or present in adjacent habitats, in accordance with the following survey methodology.

Bats

Currently there are 17 species of bat known to breed in the UK. All species and their roosts are protected under Regulation 41 of *The Conservation of Habitats and Species Regulations 2010 (as amended)*. As a signatory to the *Bonn Convention (Agreement on the Conservation of Bats in Europe)* the UK is also required to protect their habitats. This legislation makes it illegal to kill, injure, capture or disturb bats, or to obstruct access to, damage or destroy bat roosts. Under the law, a roost is any structure or place used for shelter or protection.

A visual survey of the site was completed to record any evidence of bats or features that could provide potential roosting opportunities. The survey was carried out following the guidelines provided by the Bat Conservation Trust² and by an experienced and licensed ecologist³. A thorough internal and external

¹ PL/24/1593

² Collins, J. (ed) (2023) *Bat Surveys for Professional Ecologists: Good Practice Guidelines* (4th edition). The Bat Conservation Trust, London.

³ The lead surveyor was Alan Beaumont BSc (Hons), MSc, MCIEEM.

examination of the existing building was carried out, with any potential access points inspected for evidence of bats. All internal roof voids/spaces, where present, were accessed to check for any evidence of bats. The building was assessed in accordance with the following criteria:

- **None** – No habitat features on site likely to be used by any roosting bats at any time of the year (i.e. a complete absence of crevices/suitable shelter at all ground/underground levels).
- **Negligible** – No obvious habitat features on site likely to be used by roosting bats; however, a small element of uncertainty remains as bats can use small and apparently unsuitable features on occasion.
- **Low** - A structure with one or more potential roost sites that could be used by individual bats opportunistically at any time of the year. However, these potential roost sites do not provide enough space, shelter, protection, appropriate conditions and/or suitable surrounding habitat to be used on a regular basis or by larger numbers of bats (i.e. unlikely to be suitable for maternity and not a classic cool/stable hibernation site, but could be used by individual hibernating bats).
- **Moderate** - A structure with one or more potential roost sites that could be used by bats due to their size, shelter, protection, conditions and surrounding habitat but unlikely to support a roost of high conservation status (with respect to roost type only, such as maternity and hibernation – the categorisation described in this table is made irrespective of species conservation status, which is established after presence is confirmed).
- **High** - A structure with one or more potential roost sites that are obviously suitable for use by larger numbers of bats on a more regular basis and potentially for longer periods of time due to their size, shelter, protection, conditions and surrounding habitat. These structures have the potential to support high conservation status roosts, e.g. maternity or classic cool/stable hibernation site.

The surrounding habitat was also surveyed to identify any important features such as mature trees with suitable features for roosting bats and any established lines of vegetation that might provide important flightlines.

Evidence of bats is usually detected by any one or more of the following signs:

- the presence of bat droppings, which tend to accumulate under established roost sites or at roost entrances;
- the accumulation of large numbers of moth wings, which have been discarded by feeding bats;
- areas of staining by urine or from fur rubbing; and
- the presence of bats themselves or their corpses.

The visual survey was facilitated by the use of binoculars, ladders, powerful torches (1M candlepower) and a Ridgid Micro CA-350 Inspection Camera endoscope. A heterodyne bat detector (Pettersson D200) was also used to record any bat calls during the inspection.

Other Wildlife

In accordance with good practice, the site was checked for any evidence of other protected species or species of particular note.

RESULTS

Baseline Data

A summary of the baseline data obtained from TVERC has been provided below; please note, a copy of the report has not been included but can be requested by the Local Planning Authority⁴.

There are no statutory ecological designated sites located on or within 1 km of the site. The nearest statutory designated site is Lousehill Copse Local Nature Reserve (LNR), located approximately 2.8 km to the west of the site. The nearest non-statutory designated site is Holy Brook Berkshire Local Wildlife Site

⁴ TVERC data is issued under licence and therefore can only be accessed by those named in the initial Data Search Request.

(BLWS), located approximately 0.58 km to the south of the site. Further details of designated sites are provided in Table 1.

No records of protected species were returned on the site, although there were a number within the surrounding 1 km study area, the majority of which were supplied with specific 6-figure grid references allowing a high-resolution indication of their locations. Further details of protected species recorded within the 1 km study area are provided in Table 1.

According to the Multi-agency website, there are no Habitats of Principal Importance (HPIs) located on or adjacent to the site. The nearest HPI is an area of Deciduous Woodland, also noted in the National Forest Inventory, located approximately 0.68 km to the south of the site.

Google Earth imagery shows that the site has remained largely unchanged since at least 2003, with the site being dominated by the existing buildings with associated hardstanding.

Table 1: Summary of Data Search Results (provided by TVERC)

Non-Statutory Designated Sites		
Description	Protection/designation	Distance/direction
Holy Brook	BLWS	0.58 km to the S
River Kennet/ Kennet & Avon Canal	BLWS	0.79 km to the S
Cow Lane Depot	BLWS	0.82 km to the NW
Protected/notable Species (Specific Grid References)		
Species	Protection/designation	Distance from site
Herring Gull (<i>Larus argentatus</i>)	Priority Species	0.11 km to the NE
Common Pipistrelle (<i>Pipistrellus pipistrellus</i>)	European Protected Species & Protected Species	0.11 km to the S
Serotine (<i>Eptesicus serotinus</i>)	European Protected Species & Protected Species	0.11 km to the S
Long-eared Bat species (<i>Plecotus</i>)	European Protected Species, Protected Species	0.11 km to the S
Myotis Bat species (<i>Myotis</i>)	European Protected Species, Protected Species	0.11 km to the S
Noctule Bat (<i>Nyctalus noctula</i>)	European Protected Species, Protected Species & Priority Species	0.11 km to the S
Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>)	European Protected Species, Protected Species & Priority Species	0.11 km to the S
Stag Beetle (<i>Lucanus cervus</i>)	European Protected Species, Protected Species (against sale) & Priority Species	0.13 km to the SW
Black Redstart (<i>Phoenicurus ochruros</i>)	Protected Species	0.19 km to the ENE
Bat (<i>Chiroptera</i>)	European Protected Species, Protected Species	0.21 km to the ESE
Pipistrelle Bat species (<i>Pipistrellus</i>)	European Protected Species, Protected Species	0.21 km to the ESE
Starling (<i>Sturnus vulgaris</i>)	Priority Species	0.22 km to the WSW
Peregrine (<i>Falco peregrinus</i>)	Protected Species	0.28 km to the NNW
Red Kite (<i>Milvus milvus</i>)	Protected Species	0.33 km to the NNE
West European Hedgehog (<i>Erinaceus europaeus</i>)	Priority Species	0.38 km to the S
Eurasian Otter (<i>Lutra lutra</i>)	European Protected Species, Protected Species & Priority Species	0.45 km to the SSE
Green Sandpiper (<i>Tringa ochropus</i>)	Protected Species	0.5 km to the ESE
Song Thrush (<i>Turdus philomelos</i>)	Priority Species	0.6 km to the N
Nathusius's Pipistrelle (<i>Pipistrellus nathusii</i>)	European Protected Species & Protected Species	0.68 km to the E
Bluebell (<i>Hyacinthoides non-scripta</i>)	Protected Species	0.68 km to the SSE
Daubenton's Bat (<i>Myotis daubentonii</i>)	European Protected Species & Protected Species	0.69 km to the NNE
Dunnock (<i>Prunella modularis</i>)	Priority Species	0.76 km to the N
Grass Snake (<i>Natrix helvetica</i>)	Protected Species & Priority Species	0.81 km to the WNW
House Sparrow (<i>Passer domesticus</i>)	Priority Species	0.88 km to the WSW
Redwing (<i>Turdus iliacus</i>)	Protected Species	0.88 km to the WSW
Small Heath (<i>Coenonympha pamphilus</i>)	Priority Species	0.89 km to the SSW
Grey Dagger (<i>Acronicta psi</i>)	Priority Species	0.93 km to the WSW
Fieldfare (<i>Turdus pilaris</i>)	Protected Species	0.94 km to the ESE
Common Frog (<i>Rana temporaria</i>)	Protected Species (against sale)	0.97 km to the SE

White-letter Hairstreak (<i>Satyrus w-album</i>)	Protected Species & Priority Species	1.06 km to the W
Protected/notable Species (Coarse Resolution Records)		
Species	Protection/designation	Accuracy of record
Common Pipistrelle (<i>Pipistrellus pipistrellus</i>)	European Protected Species & Protected Species	1 km record
Daubenton's Bat (<i>Myotis daubentonii</i>)	European Protected Species & Protected Species	1 km record
Bat (<i>Chiroptera</i>)	European Protected Species, Protected Species	1 km record
Soprano Pipistrelle (<i>Pipistrellus pygmaeus</i>)	European Protected Species, Protected Species & Priority Species	1 km record
Bullfinch (<i>Pyrrhula pyrrhula</i>)	Priority Species	1 km record
Dunnock (<i>Prunella modularis</i>)	Priority Species	1 km record
Herring Gull (<i>Larus argentatus</i>)	Priority Species	1 km record
House Sparrow (<i>Passer domesticus</i>)	Priority Species	1 km record
Lapwing (<i>Vanellus vanellus</i>)	Priority Species	1 km record
Lesser Redpoll (<i>Carduelis cabaret</i>)	Priority Species	1 km record
Skylark (<i>Alauda arvensis</i>)	Priority Species	1 km record
Song Thrush (<i>Turdus philomelos</i>)	Priority Species	1 km record
Starling (<i>Sturnus vulgaris</i>)	Priority Species	1 km record
Black Redstart (<i>Phoenicurus ochruros</i>)	Protected Species	1 km record
Brambling (<i>Fringilla montifringilla</i>)	Protected Species	1 km record
Fieldfare (<i>Turdus pilaris</i>)	Protected Species	1 km record
Greylag Goose (<i>Anser anser</i>)	Protected Species	1 km record
Kingfisher (<i>Alcedo atthis</i>)	Protected Species	1 km record
Peregrine (<i>Falco peregrinus</i>)	Protected Species	1 km record
Red Kite (<i>Milvus milvus</i>)	Protected Species	1 km record
Redwing (<i>Turdus iliacus</i>)	Protected Species	1 km record
White-tailed Eagle (<i>Haliaeetus albicilla</i>)	Protected Species	1 km record
Common Scoter (<i>Melanitta nigra</i>)	Protected Species & Priority Species	1 km record
Eurasian Badger (<i>Meles meles</i>)	Badgers Act (1992)	1 km record
Pipistrelle Bat species (<i>Pipistrellus</i>)	European Protected Species, Protected Species	1 km record
Noctule Bat (<i>Nyctalus noctula</i>)	European Protected Species, Protected Species & Priority Species	1 km record
Linnet (<i>Linaria cannabina</i>)	Priority Species	1 km record
Reed Bunting (<i>Emberiza schoeniclus</i>)	Priority Species	1 km record
Firecrest (<i>Regulus ignicapilla</i>)	Protected Species	1 km record
Cinnabar (<i>Tyria jacobaeae</i>)	Priority Species	1 km record
Brown Long-eared Bat (<i>Plecotus auritus</i>)	European Protected Species, Protected Species & Priority Species	1 km record
Yellow Wagtail (<i>Motacilla flava</i>)	Priority Species	1 km record
Smooth Newt (<i>Lissotriton vulgaris</i>)	Protected Species (against sale)	1 km record
Nathusius's Pipistrelle (<i>Pipistrellus nathusii</i>)	European Protected Species & Protected Species	1 km record
Long-eared Bat species (<i>Plecotus</i>)	European Protected Species, Protected Species	1 km record

N.B. All distances are calculated from the centre of the site, National Grid Reference SU 713734.

BLWS = Berkshire Local Wildlife Site.

European Protected Species = species listed under *The Habitats Directive Annexes II and IV*.

Protected Species = species listed under the *Wildlife and Countryside Act 1981 (as amended)* Schedules 1, 5 and 8.

Priority Species = species listed under the *Natural Environment and Rural Communities (NERC) Act 2006* Section 41.

Site Description (Photographs 1 – 4)

The site is located off St Mary's Butts in Reading town centre, centred at National Grid Reference: SU 713734 and covers less than 0.1 of a hectare. The site comprised the existing building with associated hardstanding, surrounded by a mix of commercial/retail development and associated roads.

The building was a three-storey masonry constructed office block with a flat, felt covered roof, with shops on the ground floor. The front façade had sections of decorative metal cladding. Internally, there were no separate roof voids/spaces with a service unit on the roof used to house plant for the lift, heating and air conditioning for the offices. There was a small car park at the rear.

The site was completely dominated by the building and hardstanding areas, with no vegetation or habitats present.

Bats

No evidence of bats was recorded during the thorough internal and external inspection of the building. The brick/block work and mortar throughout was in good condition and well-sealed. The roof covering was in good condition, with no obvious access points recorded and the roof was well sealed and lacked any separate attics/roof spaces. The service unit on the roof was accessed and found to be well-sealed. The building due to construction type and condition, lacking any separate roof voids/spaces and/or crevice dwelling opportunities, was assessed to provide **negligible** roosting opportunities for bats.

The site being dominated by the existing building and hardstanding located within a well-lit urban area, provides very limited foraging opportunities for bats.

Other Wildlife

Apart from a few common species of birds, either recorded on the site or flying overhead, no other species of any note were recorded.

DISCUSSION AND RECOMMENDATIONS

The redevelopment proposals obtained planning and the revised application is simply to increase the number of serviced apartment units from 37 to 41. There are no changes to the exterior of the proposed extant consent.

There are no habitats of international, national, county or local importance that would be directly affected by the proposals. The site is of overall low ecological value, with the species recorded described as common or abundant and are found in similar places across much of Britain, with no evidence of bats or other protected species recorded. As there are no habitats present on the site and the site is located in the centre of Reading and has remained unaltered, there is no requirement to complete an updated survey, with the survey findings previously recorded still considered valid.

As the proposal does not impact a priority habitat and there is no habitat recorded on the site, then the development is subject to the *de minimis* exemption for Biodiversity Net Gain (BNG).

Although there are considered to be no ecological constraints to the proposals, a series of generic mitigation measures, as detailed below, should be implemented to reduce any impact the development proposals may have on local wildlife. The proposals could also include some enhancement measures to increase the nature conservation value of the site in the long term in accordance with Government guidance as set out in National Planning Policy Framework (NPPF) 2024⁵.

A thorough examination of the building was completed, with all potential access points and/or roosting opportunities fully inspected for evidence of bats. The building was fully accessed and not complex allowing a thorough inspection and, therefore, there are considered to be no constraints to the survey findings. Although no evidence of bats was recorded, with the building assessed to provide **negligible** roosting opportunities for bats and no further surveys are considered necessary, in accordance with best practice all site operatives should be given a toolbox talk so that they are fully aware of current legislation protecting bats and their roosts (copy has been attached at Appendix A). In the unlikely event of any bats being encountered on the site, then works should stop immediately and Natural England or AAe contacted so that appropriate advice can be provided (**N.B. a European Protected Species Licence may then be required to permit the works to continue**).

⁵ Ministry of Housing, Communities & Local Government (2024). *National Planning Policy Framework*. London.

It should be noted that all species of wild bird and their nests are protected under the *Wildlife and Countryside Act 1981 (as amended)*. Although there are very limited nesting opportunities with no old or active bird nests recorded during the survey, a check should be carried out prior to any works to ensure there are no active nests present.

Although the works are restricted with limited opportunities to implement any enhancement measures, a series of wildlife boxes (such as bat and bird boxes) could be installed onto the site to provide enhanced roosting and nesting opportunities. Any boxes installed should be positioned in accordance with good practice.

The effects of lighting on plants and animals are difficult to assess, but it is thought that lighting can adversely affect invertebrates, birds and bats. As the site is located in the town centre and is currently well-lit, and there are considered to be no changes in light levels as a result of the proposals, then there would be no adverse impact on nocturnal animals.

Overall the findings of this ecological survey would indicate that there are no over-riding ecological constraints to the redevelopment proposals that would preclude planning permission being granted, subject to appropriately worded conditions. A range of standard controls are available and deliverable to ensure that there would be no adverse impact on local wildlife that are using the site with a series of controls to be implemented to avoid contravention of current legislation.

Author:

Alan Beaumont
BSc (Hons) MSc MCIEEM
Director of Ecology
E alan.beaumont@aae-ltd.co.uk

Office:

AA Environmental Ltd
Units 4-8
Cholswell Court
Shippon
Abingdon
Oxon OX13 6HX

Company No. 8474322

E info@aae-ltd.co.uk
T 01235 536042
F 01235 523849

Photograph Record Sheet



Photograph 1: Showing the front of the building.



Photograph 2: Showing the rear of the building.



Photograph 3: Showing the flat roof and service unit.



Photograph 4: Showing the inside of the service unit, housing the lift mechanism.

Rev.	Details		Drawn	Date
			Chkd.	
PROJECT				
St Mary's House St Mary's Butts Reading				
TITLE				
Photograph Record Sheet				
 AA Environmental Ltd Units 4-8 Cholswell Court Shippon Abingdon Oxon OX13 6HX T: 01235 536042 F: 01235 523849 info@aae-ltd.co.uk www.aae-ltd.co.uk				
Scale	Date	16.04.26	Drg No.	Rev.
NTS	Drawn EC	Chkd. ARB	243297/01	

Appendix A

Toolbox Talk (Bats)

TOOLBOX TALK: BATS

Did you know?

- Bats are the world's only flying mammal.
- There are 17 species of bat known to be breeding in the UK, 6 of which are endangered or rare and 6 are classed as vulnerable.
- Bats can be found across the country in urban and rural locations.
- They are often sighted at dusk as they leave their roost, flying around hedgerows, woodland and waterbodies, feeding on insects.
- Throughout the year bats will often change their roost, depending upon the season.
- Usually a pregnant female will only have one baby a year, this makes colonies vulnerable to population decline.
- During the winter bats hibernate and may not wake up, even if disturbed. Therefore it's important not to work on sites with bats during these months.
- Bats may not use the same roost throughout the year, however they are legally protected with or without a bat occupying them.

Identification

- You may find bats in any number of places, they tend to prefer dark, quiet spots with good shelter, such as holes and cracks in trees, roofs and walls of buildings, under bridges, old tunnels and in caves.
- Signs of bat presence include discarded moth wings, staining around crevices and small mouse-like droppings which crumble easily.

Legislation

- All bats and their roosts are protected by UK and European Law. This makes it **illegal to kill, injure, capture or disturb bats** or obstruct access to, damage or destroy their roosts and protects important feeding areas from damage or disturbance.
- Under law, a roost is any structure or place used for shelter or protection.

Site Controls

- There is always a **risk** that bats, as they move between different roost sites and occupy new roosts, could be encountered during site works.
- **If any bats are encountered during works the following controls must be applied to avoid breaking the law:**
 1. If bats are discovered/suspected works must stop **immediately** with any bat left in-situ and AAe immediately contacted (contact details above).
 2. If any injured bats are found during the works AAe would care for them and where possible be released in the same location once recovered.
 3. During works staff must wear gloves in case of accidental contact with bats.
 4. Any roof tiles will be lifted straight up, rather than being rolled over, minimising the risk of harming bats which may be sheltering underneath.
 5. Areas must be fully checked for any bats or their evidence prior to filling any gaps and repointing any brickwork.
 6. Any lighting must be installed must avoid illuminating vegetation and or bat boxes/access points.

These controls have been put in place to protect all site operatives from breaking the law. You're not expected to be able to identify bats or their presence so remember, **if in doubt shout and contact the relevant person.**

Key Contacts

AA Environmental Ltd, Units 4-8 Cholswell Court, Shippon, Oxfordshire, OX13 6HX

Tel: 01235 536042



Brown long-eared bat.



Lesser horseshoe bat in rail tunnel.



Common pipistrelle bat.