

Flint Street,
Castle Street,
Reading

Ecological Assessment

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Quality Assurance

Where field investigations have been carried out, these have been restricted to a level of detail required to achieve the stated objectives of the work.

This work has been undertaken in accordance with the quality management system of Red Ecology Limited.

The surveys and reporting detailed within this report have been undertaken by ecologists who are sufficiently experienced and competent in conducting the ecology and assessment work.

No part of this document constitutes a legal opinion.

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Executive Summary

Red Ecology was instructed in June 2025 by S2 Castle Street Limited (the Applicant) to undertake an Ecological Assessment of the site of the former Thames Valley Police Station, Castle Street, Reading, Berkshire.

The site is comprised of the former Thames Valley Police Station, scattered raised brick beds with ornamental planting, sections of modified grassland, and hardstanding access routes for vehicles or pedestrians. The Reading Police Station building and hardstanding cover the majority of the site. There are trees lining the western and southwestern boundaries of the site.

A habitat survey was undertaken by Red Ecology on 3 June 2025. A desk study was also completed.

The site is not subject to or adjacent to any statutory designations. The closest statutory designation is Lousehill Copse Local Nature Reserve (LNR), some 2.6km to the west of the site. This is separated from the site by the A329 dual carriageway, a railway line and existing residential development. Given the distance to the statutory designated sites in the locality, the intervening land use and the nature of the proposed development, significant adverse effects are not likely and there is no requirement for any mitigation measures.

The site is not subject to, or adjacent to, any non-statutory designations. The nearest such designation is Holy Brook Local Wildlife Site (LWS), some 293m to the south of the site, beyond the A329 (later the A33) dual carriageway. Significant adverse effects on the LWS as a result of the proposed development are not likely; given the presence of the dual carriageway there is no possibility of direct encroachment, and indirect effects such as dust deposition are unlikely given the distance and need to control such effects closely given the context. Suitable construction safeguards would be adopted as part of a Construction Environmental Management Plan (CEMP), which could be secured by condition.

There is no designated ancient woodland in the vicinity of the site. High Wood is located 3.6km to the east of the site and is classified as Ancient and Semi-natural Woodland, according to the MAGIC website. Holy Brook LWS contains sections of woodland classed as Deciduous Woodland priority habitat, according to the MAGIC website. This is simply a habitat classification and carries no implications of quality. Effects on these woodland habitats are unlikely due to the distance from the development area and intervening features.

The site is virtually devoid of habitats of ecological interest. The introduced shrubs and modified grassland have some very limited value; some of these features are to be lost. Approximately half of the trees are to be retained as part of the proposed development, but the remainder are due to be lost. The landscape scheme for the proposed development includes new tree planting to replace the removed trees, as well as adding green roofs and a podium communal courtyard on the new building. These features may offer new habitat for wildlife once established.

The site shows no sign of significant use by bats and is of negligible value to foraging bats, however records indicate that the site is used by largely common and widespread bat species. This is indicative of its role as a habitat corridor. No trees with the potential to be adversely impacted by the proposals were identified as supporting potential roosting opportunities for bats. The lighting strategy should have full regard to the best practice guidance. It is noted that existing lighting will also come from the immediate surroundings. To provide suitable roosting opportunities, a series of bat boxes will be provided on trees within the site boundary.

No signs of Hedgehog were identified during survey work completed, and the habitats onsite and immediately adjacent present little suitability. It is unlikely that Hedgehogs would be found within the site during construction work.

A small number of common bird species were recorded during survey work. The site is overall of low value for nesting and foraging birds, with habitats of greater value available further afield. Any necessary removal of suitable nesting habitat would be undertaken outwith the nesting bird season (March to August inclusive) to avoid a possible offence under the legislation. Where this cannot be achieved, a check survey for nesting birds would be undertaken by a suitably qualified ecologist, with any confirmed nests protected with a 5m radius buffer, delineated using hazard tape and left in situ until the young have fledged. The landscape scheme could provide new nesting and foraging opportunities for birds. The applicant will consider opportunities for installation of new nesting opportunities for birds, including Swift bricks and tree-mounted nest boxes.

The site provides no significant opportunities for reptiles and, given the regular management of the grassland and isolated nature of areas of shrub, they are not considered likely to be on site.

There are no ponds within the site. The nearest pond is approximately 1.4km to the northeast of the site. There is no suitable terrestrial habitat present and no likelihood of amphibians, including Great Crested Newts, being adversely affected by the proposed development. There was one record for Great Crested Newt returned by Thames Valley Environmental Records Centre (TVERC), however this was 1.4km away and there are dispersal barriers between the record location and the site. Their presence in the locality is considered unlikely.

Given the limited vegetation on site, it is likely utilised by a range of common invertebrate species but unlikely to support any rare species of conservation concern. A large number of Stag Beetle records were returned by TVERC, indicating that the species is widespread across the search area, but the site contains no suitable dead wood habitats and, hence, the species is unlikely to be present in this location.

Overall, the proposed development is in line with planning policy with respect to ecology and biodiversity, and with relevant legislation.

1. Introduction

1.1. Project Background

- 1.1.1. Red Ecology was instructed in June 2025 by S2 Castle Street Limited to undertake an Ecological Assessment of the site of Flint Street, Castle Street, Reading, Berkshire (Figure 1).
- 1.1.2. The site comprises the former Thames Valley Police Station, scattered ornamental planting, urban trees, sections of grassland, and hardstanding access routes for vehicles or pedestrians.

1.2. Proposals

- 1.2.1. A detailed planning application is being submitted for the demolition of existing structures and construction of a new structure. The description of development is:

Full planning permission for the demolition of the existing building and the erection of a residential-led mixed-use development comprising Use Class C3 residential units, with Use Class E and Sui Generis on the ground floor and with some elements at lower ground floor, plus public realm, hard and soft landscaping, access and servicing arrangements, cycle parking, and other associated works.

1.3. Purpose of Report

- 1.3.1. This document assesses the ecological interest of the site. The importance of the ecological interest (such as habitats and protected species) within the site is evaluated with due consideration given to the guidance published by the Chartered Institute of Ecology and Environmental Management (CIEEM).
- 1.3.2. Where considered necessary, mitigation measures are recommended to safeguard any significant existing ecological interest within or adjacent to the site and, where appropriate, potential enhancement measures are put forward and reference made to both national and local biodiversity priorities.

2. Planning Policy, Legislation and Guidance

- 2.1. This section provides a summary of the relevant planning policy, legislation and guidance that inform the assessment process.

2.2. Planning Policy

- 2.2.1. Planning policy is defined at two levels: nationally through the National Planning Policy Framework (NPPF) and locally through the policies of Reading Borough Council.

National Planning Policy Framework

- 2.2.2. The latest edition of the NPPF was adopted in December 2024, with minor amendments made in February 2025. Paragraphs 187 to 201 are concerned with conserving and enhancing the natural environment.
- 2.2.3. Paragraph 187 states that planning policies and decision should contribute to and enhance the natural environment by inter alia protecting and enhancing sites of biodiversity value, minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures, and preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution.
- 2.2.4. Paragraph 188 notes the need to distinguish between the hierarchy of international, national and locally designated sites, and for plans to take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure.
- 2.2.5. Paragraph 192 is concerned with the protection and enhancement of biodiversity, stating that plans should identify and safeguard components of local wildlife-rich habitats and wider ecological networks, including designated sites and wildlife corridors. They should also promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species and secure net gains for biodiversity.
- 2.2.6. Determination of planning applications is addressed by paragraph 193, which notes that a proposal should be refused if significant harm to biodiversity cannot be avoided, mitigated or compensated for. Reference is made to Sites of Special Scientific Interest (SSSIs), at 193(b), and irreplaceable habitats (including ancient woodland and veteran trees), at 193(c).
- 2.2.7. Paragraphs 10 and 11 of the NPPF are clear that “[p]lans and decisions should apply a presumption in favour of sustainable development”. Paragraph 195 states that this does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site (‘habitats site’ being the term applied to what were formerly known as European sites).

Reading Local Plan (adopted November 2019)

- 2.2.8. Reading Borough Council is in the process of undertaking a Partial Update of the Local Plan to cover around half of the policies in the plan. The Local Plan Partial Update was submitted to the

Secretary of State in May 2025. Submission marks the beginning of a process of public examination led by an independent Inspector. The extant Development Plan remains the Reading Local Plan (adopted November 2019) from which the below policies are referenced.

- 2.2.9. **Policy EN3 Enhancement of Conservation Areas** relates inter alia to the protection of sites with identified biodiversity interest and to areas with potential for biodiversity value and those which connect the Green Network together. The policy refers to avoidance of effects, mitigation and, as a last resort, compensation.
- 2.2.10. **Policy EN7 Local Green Space and Public Open Space** lists the Local Green Spaces (LGS) which are protected from development and includes reference to land which “holds local significance, for example because of its ... richness of wildlife”.
- 2.2.11. **Policy EN12 Biodiversity and the Green Network** notes that (a) the identified Green Network should be protected and enhanced, and (b) development should provide a net gain for biodiversity wherever possible.
- 2.2.12. **Policy EN14 Trees, Hedges and Woodlands** notes inter alia that new development shall make provision for tree retention and planting within the application site, particularly on the street frontage.

Local Plan Partial Update (submitted May 2025)

- 2.2.13. Policy EN12 has been amended in the Local Plan Partial Update from *Biodiversity and the Green Network* to *Biodiversity*, as detailed below.
- 2.2.14. **Policy EN12 Biodiversity** still relates to the protection of the Green Network and lists site designations, habitats and features which comprise the Green Network. It now states that development should be designed to maximise opportunities for the Green Network and have regard to the Berkshire Local Nature Recovery Strategy (BLNRS). It now relates to Biodiversity Net Gain (BNG) which should be delivered on-site wherever possible, wildlife friendly designs, protection of waterbodies and protection of soils.

2.3. Legislation

- 2.3.1. The legislation relevant to the assessment is as follows:
- The Wildlife and Countryside Act 1981 (as amended);
 - Natural Environment and Rural Communities (NERC) Act 2006;
 - The Conservation of Habitats and Species Regulations 2017 (as amended); and
 - The Environment Act 2021.

2.4. Guidance

- 2.4.1. The following guidance is relevant to the site and proposed development:
- Baker et al. (2019). *Biodiversity Net Gain. Good Practice Principles for Development. Part A: A Practical Guide*;

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- Bat Conservation Trust & Institution of Lighting Professionals (2023). Guidance Note GN08/23: Bats and Artificial Lighting At Night.
 - BRIG (2011). *UK Biodiversity Action Plan: Priority Habitat Descriptions*. JNCC, Peterborough;
 - CIEEM (2017) *Guidelines for Preliminary Ecological Appraisal*. 2nd Edition;
 - CIEEM (2022). *Guidelines for Ecological Impact Assessment in the UK and Ireland*;
 - Collins, J. (ed.) (2023). *Bat Surveys for Professional Ecologists: Good Practice Guidelines*. 4th Edition. The Bat Conservation Trust, London.
 - DEFRA (2024). *The Statutory Biodiversity Metric User Guide*;
 - DEFRA (2024). *Statutory Biodiversity Technical Annex 1 – Condition Assessment Sheets and Methodology*;
 - Office of the Deputy Prime Minister (2005). *Government Circular: Biodiversity and Geological Conservation – Statutory Obligations and Their Impact Within The Planning System*;
 - UKHab Ltd (2023). *UK Habitat Classification Version 2.0* (at <https://www.ukhab.org>).

3. Survey Methodology

3.1. Desk Study

- 3.1.1. A background data search was undertaken, comprising a request to Thames Valley Environmental Records Centre (TVERC) and covering a search radius of 2km centred on the site. Red Ecology has reviewed this information, as well as the MAGIC website and other online resources. Information on designated sites in the locality is detailed on Figure 1.

3.2. Habitat Survey

- 3.2.1. A habitat survey was undertaken by Red Ecology on 3 June 2025.
- 3.2.2. The site was surveyed using UKHab classification methodology, whereby the habitat types present are identified and mapped, together with an assessment of the species composition of each habitat and their condition. This technique provides an inventory of the basic habitat types present and allows the identification of any areas of greater interest that could require further survey.
- 3.2.3. The site was classified into areas of similar botanical community types, with a representative species list compiled for each habitat identified.
- 3.2.4. Species within the habitats identified were each assigned a score corresponding with their percentage cover within each habitat. The abundance scores are based on the Braun-Blanquet Scale: D=Dominant 76-100%, A=Abundant 51-75%, F=Frequent 26-50%, O=Occasional 6-25% and R=Rare >1-5%. The letter L is used when there is a Local variation in the abundance with the same habitat, e.g. that a given species is seen to be locally frequent.
- 3.2.5. The generally recognised optimum period for botanical survey work is April to September inclusive, though not all species would necessarily be apparent throughout that period, since growing and flowering seasons differ. The survey was undertaken within the optimum period, and an accurate and robust assessment has been completed.

3.3. Faunal Survey

- 3.3.1. Regard was had to any incidental observations of wildlife made during the habitat survey, particularly protected and notable species. This includes records of the animals themselves, whether within the site, passing overhead, or off-site, and / or evidence of presence such as droppings or foraging signs. A specific survey was undertaken for bats.

3.4. Bats

- 3.4.1. On 6 June 2025, the building was subject to an external and internal inspection with regards to roosting bats. The external inspection chiefly comprised an inspection with binoculars from ground level, as well as inspecting available surfaces such as ledges and windowsills. This would allow potential roost features and potential access points to be identified.
- 3.4.2. The internal inspection involved inspecting accessible internal spaces and all interior surfaces for feeding remains and bat droppings, particularly the top floor of the building. External areas of the roof were inspected where possible and safe to do so.

- 3.4.3. Any features suitable for roosting by bats were identified and / or evidence of bat activity as listed in Table 3.1 below were noted. The building was then categorised as to its suitability to support roosting bats.
- 3.4.4. A high-level assessment of the habitats surrounding the buildings was undertaken to assess their potential to support roosting or foraging / commuting bats. A visual inspection of trees was undertaken from ground-level in order to identify any features of interest which may have the potential to contain a bat roost.
- 3.4.5. The survey methodology followed best practice guidelines. Equipment used, and at hand, during the building inspection included, close-focusing binoculars, hand-held LED torch and a high-powered torch.
- 3.4.6. The weather conditions recorded during the survey on 6 June were initially rain and later cloud, with moderate wind (wind 5B) and temperatures of approximately 14°C.

Table 3.1. External and internal bat roosting or access features or direct evidence of bats.

External Inspection: Features	Internal Inspection: Features and Evidence
Gaps between roof tiles or ridge tiles	Live bats or bat corpses
Gaps under hanging tiles	Droppings
Gaps under the eaves	Bat sounds
Cracks and crevices in the brickwork	Potential access points
Gaps around doorways/windows	Potential roosting sites
Potential access points	Clean, cobweb free gaps around potential entrance points

- 3.4.7. The potential for the buildings to support roosting bats was assessed using the findings of the survey. The following criteria were used to determine the level of potential of the buildings for roosting bats:
- **Negligible** – While presence cannot be absolutely discounted there were no significant visible features that could be used by bats for roosting.
 - **Low** – Small number of potential roosting features such as could be utilised by individual opportunistic roosting bats. Site situated within isolated habitat that could be used by foraging bats, but which is not connected by prominent linear features such as woodland edge, hedgerows and tree lines.
 - **Moderate** – Several potential roosting features in the buildings or other structures. There is surrounding habitat such as woodland, scattered trees, hedgerows suitable to support foraging and roosting bats. The site relates to the wider landscape by linear features such as woodland edge, hedgerows and tree lines that could be used by commuting bats.
 - **High** – Buildings or other structures, such as mines, caves, tunnels, ice houses and cellars, with numerous features of potential significance for roosting bats. Surrounding landscape has high value habitat for roosting, foraging and commuting that is contiguous with on-site habitats. The site relates to the wider landscape by strong linear features and may be close to known roosts or other potentially valuable habitat resources.

- **Confirmed roost** – Evidence indicates a building or other structure is used by bats, for example:
 - i) bats seen roosting or observed flying from a roost or freely in the habitat;
 - ii) droppings, carcasses, feeding remains;
 - iii) bats heard ‘chattering’ inside on a warm day or at dusk.

3.4.8. Where possible, the number of bats likely to be using the roost site and the species of bat(s) would be determined from the evidence available.

3.5. **General Limitations**

3.5.1. Although desk study data are useful in providing supplementary ecological information for a site, it should be acknowledged that these data are dependent on the submission of records to the relevant organisation.

3.5.2. As such, a lack of records for a particular species does not necessarily mean that the species is absent from the site and / or the wider search area. Similarly, records of a particular species do not necessarily mean that the species is still present within the site and / or wider search area. Equally, any record does not inform the relative abundance or scarcity of a species from the area.

3.5.3. Ecological features can be transient by nature, and the distributions of habitats and species may be subject to change over time. Hence, in line with generally accepted practice, the ecological survey data presented in this report are considered valid for 18-24 months, after which it may be necessary for further field surveys and / or updates to background records to be undertaken.

4. Ecological Context

4.1. Ecological Character of the Site and Locality

- 4.1.1. The former Thames Valley Police Station building covers approximately 0.6ha and comprises three connected sections of flat-topped office blocks: a five-storey hexagonal block to the northwest, the central four-storey block and a two-storey block to the east. There is a basement section which comprises a car park with sensor-activated strip lights and is accessed from roads on the western and southern sides of the site.
- 4.1.2. The site contains ornamental beds which are distributed across the whole site. There is modified grassland to the south of the site. The western part of the site boundary contains a row of mature London Plane *Platanus x hispanica* trees. The southwestern corner of the site overlooks the roundabout that connects these two roads, only separated by the row of Lime *Tilia* sp. trees. The rest of the site is dominated by hardstanding for pedestrian or vehicle access.
- 4.1.3. The surrounding land is mainly hardstanding – to the west the site is bordered by the A329 and to the south by Castle Street. To the east is Cusden Walk, a concrete route for vehicle and pedestrian access between the former Police Station and Reading Magistrates' Court, the neighbouring building to the east. Behind Reading Magistrate's Court there is an open area comprising hardstanding for pedestrian access and areas of vegetation. The northern boundary of the site is mostly comprised of a sheep drop, which separates the ground-floor level of the site from the basement vehicle and pedestrian access. beyond which there is a large open space, Lavender Place Community Gardens, which is mostly dominated by vegetation. Further north lies The Hexagon Theatre, while to the northeast and east the surrounding area is mostly comprised of shops, including a pedestrian zone. The rest of the surrounding land use is generally residential, with existing housing to the south and west.
- 4.1.4. The site sits within the National Character Area (NCA) of the Thames Valley. The characteristics of this area are set out below:

The Thames Valley is a mainly low-lying, wedge-shaped area, widening from Reading, which includes Slough, Windsor, the Colne Valley and the southwest London fringes. The River Thames provides a unifying feature through a very diverse landscape of urban and suburban settlements, infrastructure networks, fragmented agricultural land, historic parks, commons, woodland, reservoirs and extensive minerals workings.

4.2. Designated Sites

Statutory Designations

- 4.2.1. The site is not subject to, or adjacent to, any statutory designations. The closest statutory designation is Lousehill Copse Local Nature Reserve (LNR), some 2.6km to the west of the site. This is separated from the site by the A329 dual carriageway, a railway line and existing residential development.

Non-statutory Designations

- 4.2.2. The site is not subject to or adjacent to any non-statutory designations. The nearest such designation is Holy Brook Local Wildlife Site (LWS), some 293m to the south of the site, beyond

the A329 (later the A33) dual carriageway. The site is designated due to it being part of a network of streams which drain the Kennet Water Meadows, and as recognition of it being a key spawning habitat for coarse fish.

Ancient Woodland and Off-site Priority Habitat

- 4.2.3. There is no designated ancient woodland in the vicinity of the site. High Wood is located 3.6km to the east of the site and is classified as Ancient and Semi-Natural Woodland, according to the MAGIC website. Holy Brook LWS contains sections of woodland classed as Deciduous Woodland priority habitat, according to the MAGIC website. This is simply a habitat classification and carries no implications of quality.
- 4.2.4. Priority habitats are defined under Section 41 (England) of the Natural Environment and Rural Communities (NERC) Act 2006. The Act requires the Secretary of State to:

...take such steps as appear... to be reasonably practicable to further the conservation of the living organisms and types of habitat included in any published under this section, or...promote the taking by other of such steps.

4.3. Background Records

- 4.3.1. Records for protected and notable species were returned by TVERC for the search area. Table 4.1 details the closest records for the main species of consideration in respect of the site and proposed development. Only records from the last 10 years are considered to be of relevance and detailed in this report.

Table 4.1: Desk Study Results Summary.

Group	Species	Status	Distance	Date
Bats	Barbastelle <i>Barbastella barbastellus</i>	Hab Regs Sch 2 W&C Act Sch 5 NERC Act Sec 41	1933m	2016
	Brown Long-eared Bat <i>Plecotus auritus</i>	Hab Regs Sch 2 W&C Act Sch 5 NERC Act Sec 41	1187m	2021
	Common Pipistrelle <i>Pipistrellus pipistrellus</i>	Hab Regs Sch 2 W&C Act Sch 5 NERC Act Sec 41	226m	2022
	Daubenton's Bat <i>Myotis daubentonii</i>	Hab Regs Sch 2 W&C Act Sch 5	235m	2019
	Leisler's Bat <i>Nyctalus leisleri</i>	Hab Regs Sch 2 W&C Act Sch 5	1614m	2023
	Nathusius's Pipistrelle <i>Pipistrellus nathusii</i>	Hab Regs Sch 2 W&C Act Sch 5	858m	2019
	Noctule <i>Nyctalus noctula</i>	Hab Regs Sch 2 W&C Act Sch 5 NERC Act Sec 41	200m	2018
	Serotine <i>Eptesicus serotinus</i>	Hab Regs Sch 2 W&C Act Sch 5	200m	2018
	Soprano Pipistrelle <i>Pipistrellus pygmaeus</i>	Hab Regs Sch 2 W&C Act Sch 5 NERC Act Sec 41	226m	2022

Group	Species	Status	Distance	Date
Mammals	Badger <i>Meles meles</i>	P of Badgers Act W&C Act Sch 5	860m	2024
	Otter <i>Lutra lutra</i>	Hab Regs Sch 2 W&C Act Sch 5 NERC Act Sec 41	287m	2020
	Water Vole <i>Arvicola amphibius</i>	W&C Act Sch 5 NERC Act Sec 41	1351m	2020
Birds	Barn Owl <i>Tyto alba</i>	W&C Act Sch 1	2455m	2022
	Black Redstart <i>Phoenicurus ochrurus</i>	W&C Act Sch 1	236m	2023
	Black Tern <i>Chlidonias niger</i>	W&C Act Sch 1	2455m	2016
	Black-tailed Godwit <i>Limosa limosa</i>	W&C Act Sch 1 NERC Act Sec 41	2455m	2019
	Black-winged Stilt <i>Himantopus himantopus</i>	W&C Act Sch 1	2161m	2022
	Brambling <i>Fringilla montifringilla</i>	W&C Act Sch 1	236m	2022
	Cetti's Warbler <i>Cettia cetti</i>	W&C Act Sch 1	1342m	2018
	Common Scoter <i>Melanitta nigra</i>	W&C Act Sch 1 NERC Act Sec 41	236m	2020
	Cuckoo <i>Cuculus canorus</i>	NERC Act Sec 41	1974m	2022
	Dunnock <i>Prunella modularis</i>	NERC Act Sec 41	236m	2017
	Fieldfare <i>Turdus pilaris</i>	W&C Act Sch 1	236m	2020
	Firecrest <i>Regulus ignicapilla</i>	W&C Act Sch 1	866m	2022
	Garganey <i>Spatula querquedula</i>	W&C Act Sch 1	1721m	2016
	Grasshopper Warbler <i>Locustella naevia</i>	NERC Act Sec 41	2455m	2019
	Green Sandpiper <i>Tringa ochropus</i>	W&C Act Sch 1	525m	2020
	Greenshank <i>Tringa nebularia</i>	W&C Act Sch 1	2455m	2021
	Hawfinch <i>Coccothraustes coccothraustes</i>	NERC Act Sec 41	3062m	2022
	Herring Gull <i>Larus argentatus</i>	NERC Act Sec 41	236m	2022
	Hobby <i>Falco subbuteo</i>	W&C Act Sch 1	2455m	2017
	House Sparrow <i>Passer domesticus</i>	NERC Act Sec 41	236m	2017
	Kingfisher <i>Alcedo atthis</i>	W&C Act Sch 1	836m	2023
	Lapwing <i>Vanellus vanellus</i>	NERC Act Sec 41	236m	2017

Group	Species	Status	Distance	Date
	Lesser Redpoll <i>Acanthis cabaret</i>	NERC Act Sec 41	236m	2017
	Lesser Spotted Woodpecker <i>Dryobates minor</i>	NERC Act Sec 41	2455m	2017
	Linnet <i>Linaria cannabina</i>	W&C Act Sch 1 NERC Act Sec 41	865m	2021
	Marsh Harrier <i>Circus aeruginosus</i>	W&C Act Sch 1	2455m	2022
	Marsh Tit <i>Poecile palustris</i>	W&C Act Sch 1 NERC Act Sec 41	3063m	2018
	Mediterranean Gull <i>Ichthyaetus melanocephalus</i>	W&C Act Sch 1	2455m	2020
	Merlin <i>Falco columbarius</i>	W&C Act Sch 1	2455m	2016
	Peregrine <i>Falco peregrinus</i>	W&C Act Sch 1	236m	2023
	Pintail <i>Anas acuta</i>	W&C Act Sch 1	1829m	2020
	Red Kite <i>Milvus milvus</i>	W&C Act Sch 1	236m	2023
	Redwing <i>Turdus iliacus</i>	W&C Act Sch 1	236m	2022
	Reed Bunting <i>Emberiza schoeniclus</i>	W&C Act Sch 1 NERC Act Sec 41	865m	2021
	Ring Ouzel <i>Turdus torquatus</i>	W&C Act Sch 1 NERC Act Sec 41	1989m	2022
	Ruff <i>Calidris pugnax</i>	W&C Act Sch 1	2455m	2016
	Skylark <i>Alauda arvensis</i>	W&C Act Sch 1 NERC Act Sec 41	236m	2020
	Song Thrush <i>Turdus philomelos</i>	W&C Act Sch 1 NERC Act Sec 41	236m	2017
	Spotted Flycatcher <i>Muscicapa striata</i>	W&C Act Sch 1 NERC Act Sec 41	1829m	2021
	Starling <i>Sturnus vulgaris</i>	W&C Act Sch 1 NERC Act Sec 411	236m	2022
	Whimbrel <i>Numenius phaeopus</i>	W&C Act Sch 1	1829m	2022
	White-tailed Eagle <i>Haliaeetus albicilla</i>	W&C Act Sch 1	236m	2021
	Whooper Swan <i>Cygnus cygnus</i>	W&C Act Sch 1	1989m	2022
	Wood Sandpiper <i>Tringa glareola</i>	W&C Act Sch 1	2454m	2020
	Yellow Wagtail <i>Motacilla flava flavissima</i>	W&C Act Sch 1 NERC Act Sec 41	1829m	2020
	Yellowhammer <i>Emberiza citrinella</i>	W&C Act Sch 1 NERC Act Sec 41	1355m	2021
Reptiles	Grass Snake <i>Natrix helvetica</i>	W&C Act Sch 5 NERC Act Sec 41	867m	2016

Group	Species	Status	Distance	Date
	Slow Worm <i>Anguis fragilis</i>	W&C Act Sch 5 NERC Act Sec 41	1553m	2016
Amphibians	Common Frog <i>Rana temporaria</i>	W&C Act Sch 5	825m	2018
	Common Toad <i>Bufo bufo</i>	W&C Act Sch 5 NERC Act Sec 41	1974m	2020
	Great Crested Newt <i>Triturus cristatus</i>	Hab Regs Sch 2 W&C Act Sch 5 NERC Act Sec 41	1395m	2017
	Smooth Newt <i>Lissotriton vulgaris</i>	W&C Act Sch 5	1450m	2020
Invertebrates	Cinnabar <i>Tyria jacobaeae</i>	NERC Act Sec 41	1742m	2016
	Grey Dagger <i>Acronicta psi</i>	NERC Act Sec 41	790m	2016
	Small Heath <i>Coenonympha pamphilus</i>	NERC Act Sec 41	579m	2018
	Stag Beetle <i>Lucanus cervus</i>	Hab Regs Sch 2 W&C Act Sch 5 NERC Act Sec 41	51m	2019
	White-letter Hairstreak <i>Satyrrium w-album</i>	W&C Act Sch 5 NERC Act Sec 41	1033m	2018

- 4.3.2. A large number of records for Stag Beetle *Lucanus cervus* were returned, chiefly from the 'Great Stag Hunt' events of 2020 and 2022, indicating that the species is widespread across the search area.

5. Habitats

- 5.1. The distribution of the habitats within the site is illustrated on Figure 2. Site photographs are included in Appendix 1.
- 5.2. **Buildings and Hardstanding (Developed Land; Sealed Surface, and Built Linear Features)**
- 5.2.1. Most of the site is covered by the former Thames Valley Police Station building (Photographs 1-5). This comprises three sections: a hexagonal five-storey section, the main four-storey section and a rectangular two-storey section. The structure is constructed from brick, supporting a flat concrete roof with sections of metal. The interiors of the roof sections are mostly open space with pipework, machinery and beams throughout (Photographs 6-8). There is a basement which comprises a concrete car park with sensor-activated strip lights (Photograph 9).
- 5.2.2. The majority of the remaining site is comprised of hardstanding, including pavements, access routes and car parking.
- 5.3. **Ornamental Planting (Introduced Shrub)**
- 5.3.1. Areas of ornamental planting are found adjacent to the northern, eastern and southeastern edges of the building (Photographs 10 and 11). An ornamental section can be found in a raised brick bed at the northwestern edge of the site. An ornamental section can be found beneath the Plane trees adjacent to the A329 on the western boundary of the site.
- 5.3.2. Species include Laurustinus *Viburnum tinus*, Cotoneaster *Cotoneaster* sp., Elder *Sambucus nigra*, Oregon Grape *Berberis aquifolium*, Fortune's Spindle *Euonymus hederacens*, Herb Robert *Geranium robertianum*, Ornamental Ivy *Hedera* sp., Barren Brome *Anisantha sterilis* and Common Nettle *Urtica dioica*.
- 5.3.3. Along the northern boundary there are a fence and a wall separating the site from a sheer drop to the lower level and associated access. The fence and wall have Ornamental Ivy and Virginia Creeper *Parthenocissus quinquefolia* growing over them.
- 5.4. **Modified Grassland**
- 5.4.1. A small area of well managed modified (amenity) grassland is present in the southeast of the site (Photograph 13). Reflecting the species present at the time of survey, the grassland is assessed as Modified Grassland in poor condition. This classification reflects the low species diversity of the grassland and the relative lack of broadleaved herbs and sedges (<20%).
- 5.4.2. Fescue *Festuca* sp. and Perennial Ryegrass *Lolium perenne* dominate most of this grassland sward.
- 5.4.3. Forbs present within this grassland parcel include abundant Yarrow *Achillea millefolium* and occasional Creeping Buttercup *Ranunculus repens*, Daisy *Bellis perennis*, Ragwort *Jacobaea vulgaris*, White Clover *Trifolium repens* and Dove's-foot Crane's-bill *Geranium molle*.
- 5.4.4. Along the northern boundary, adjacent to the fence and wall which separate the site from a sheer drop, there is a raised-brick bed containing a strip of modified grassland (Photograph 11).

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- 5.4.5. Fescue species dominate most of this grassland sward, with occasional Yorkshire Fog *Holcus lanatus* also present.
- 5.4.6. Forbs present within this grassland parcel include occasional Prickly Sow-thistle *Sonchus asper* and Smooth Sow-thistle *Sonchus oleraceus* as well as Creeping Buttercup, White Clover and Square-stalked St John's Wort *Hypericum tetrapterum*.
- 5.5. **Individual Trees**
- 5.5.1. There are seven Lime *Tilia* sp. trees adjacent to the roundabout (Photograph 13). These trees appear to be in fair condition, exhibiting no damage or disease. There are five London Plane trees on the western boundary of the site, adjacent to the A329, within the ornamental bed (Photograph 14). These trees also appear to be in fair condition, exhibiting no damage or disease.
- 5.6. **Non-native Invasive Species**
- 5.6.1. Certain species of Cotoneaster are listed as invasive non-native species listed on Schedule 9 Part II of the Wildlife and Countryside Act 1981 (as amended).

6. Fauna

6.1. This section sets out the results of the surveys undertaken with respect to fauna, including incidental observations.

6.2. Bats

6.2.1. The former Thames Valley Police Station building and basement have no suitability for roosting bats. There is no access to the internal roof space from outside, preventing bats from using it as a roost. The basement is open, but the structure provides very limited roosting opportunities, and no evidence of bats was found.

6.2.2. Upon visual inspection, none of the trees displayed any features with the potential to contain a bat roost.

6.2.3. Overall, the results of the data search indicate the site may be utilised by primarily common species of bats, either for foraging or as a corridor between different foraging areas and roosts. The site is not a significant foraging resource for any one species or the assemblage as a whole; however, it increases the connectivity of central Reading to habitats of greater value. This is important because of the site's proximity to a major road, meaning its presence could encourage bats to cross this dispersal barrier.

6.3. Badgers

6.3.1. No evidence of use of the site by Badgers *Meles meles* was recorded during the survey undertaken. The majority of the site is hardstanding and, therefore, unsuitable habitat.

6.3.2. As suggested by the results of the data search, the residential gardens further afield, to the south and west of the site, could offer opportunities for sett building, as well as opportunities for foraging and commuting Badgers. However, due to dispersal barriers, it is unlikely that Badgers will reach the site from these locations.

6.4. Hedgehogs

6.4.1. No evidence of Hedgehog *Erinaceus europaeus* was recorded during the course of the habitat survey. The site lacks significant woody ground cover and, therefore, nesting opportunities are limited for Hedgehog. There were no records of Hedgehogs in the data search. Hedgehogs are not considered likely to be on site.

6.5. Other Mammals

6.5.1. Records for Otter *Lutra lutra* and Water Vole *Arvicola amphibius*, were found in the data search. No evidence of these species was found during the habitat survey. Given there is no aquatic habitat on the site, it does not provide suitable habitat for either of these species and, therefore, it is unlikely that Otters or Water Voles would be found onsite.

6.6. Birds

6.6.1. The trees and introduced shrubs within the site provide limited nesting opportunities for birds, while areas of shrub and grassland provide foraging opportunities.

- 6.6.2. Bird species recorded during the habitat survey in June 2025 were limited to Magpie *Pica pica*, Blackbird *Turdus merula* and Jackdaw *Corvus Monedula*.

6.7. **Reptiles**

- 6.7.1. The site provides no opportunities for reptiles and, given the high management of the grassland and isolated nature of areas of shrub, they are not considered likely to be on site.

6.8. **Amphibians**

- 6.8.1. There are no ponds within the site. The nearest pond is 1.4km to the northeast of the site. Due to dispersal barriers, it is unlikely that any amphibians will move between the site and this location. The site consists almost wholly of built form and closely managed modified grassland. There is no suitable terrestrial habitat present and no likelihood of amphibians, including Great Crested Newts *Triturus cristatus*, being adversely affected by the proposed development.

- 6.8.2. One record for Great Crested Newt was returned by TVERC, however, this was 1.4km away and there are dispersal barriers between the recorded location and the site. Their presence in the locality is considered unlikely.

6.9. **Invertebrates**

- 6.9.1. Given the limited vegetation on site, it is likely utilised by a range of common invertebrate species but unlikely to support any rare species of conservation concern. A large number of Stag Beetle records were returned by TVERC, indicating that the species is widespread across the search area, but the site contains no suitable dead wood habitats and, hence, it is unlikely to be present in this location.

7. Evaluation and Effects

- 7.1. The CIEEM Guidelines for Ecological Impact Assessment (EcIA) provide a framework for ecological evaluation that integrates professional judgment while leveraging available data and guidance. This includes the conservation status, distribution, and abundance of species or ecological features within the local, national, or international context of a proposed project. The evaluation should be based on the best available scientific evidence, aligning with biodiversity conservation priorities at various scales.
- 7.2. In the UK, the approach to site evaluation remains influenced by the Ratcliffe criteria, initially developed in the 1970s for the Nature Conservation Review (Ratcliffe, 1977). These criteria continue to be a cornerstone for assessing and prioritising sites for conservation, such as Sites of Special Scientific Interest (SSSIs). While methodologies have evolved, SSSI designations still generally align with Ratcliffe's principles, using up-to-date scientific data, habitat mapping and species inventories.
- 7.3. The core criteria for evaluating ecological importance include size, diversity, naturalness, rarity, and fragility. In addition to these, secondary criteria such as typicalness, potential value, ecological connectivity, historical continuity and geographic context are also considered. The CIEEM guidelines emphasise that ecological assessments should account for the role of ecological networks and landscape-scale conservation efforts, ensuring that smaller or fragmented habitats are not undervalued in isolation.
- 7.4. Ecological assessments must consider the wider context, ensuring that sites are not evaluated in isolation. Many sites gain significance through their interactions with adjacent habitats or their contribution to larger ecological networks, and this landscape perspective is essential for identifying key areas for nature conservation.
- 7.5. National evaluation criteria should be adapted to account for local ecological variation. For instance, habitats that are common in one region may be of greater conservation value in another, particularly where they are at the edge of their natural range. This approach helps avoid distortion in assessments by recognising the value of habitats within their specific biogeographical context.
- 7.6. Levels of ecological importance can be determined at multiple geographic scales, ranging from local (site or locality-specific) to international. The CIEEM guidelines encourage a multi-scale approach to valuation, ensuring that the importance of features is understood in both local and wider contexts. For example, habitats or species populations of local importance can still have significant value in regional biodiversity strategies or global conservation efforts.
- 7.7. Local Biodiversity Action Plans (BAPs), although now superseded by the UK Post-2010 Biodiversity Framework and regional biodiversity strategies, continue to offer insight into local conservation priorities. Biodiversity Opportunity Areas (BOAs), a focus for targeted conservation actions and habitat restoration efforts, are also useful sources of information.
- 7.8. This assessment also takes into account the legislative and planning policy context, including compliance with the UK Government's 25 Year Environment Plan, the Environment Act 2021 and local development plans. The emphasis on achieving Biodiversity Net Gain in new developments has been a key consideration, aligning with guidance on ecological impact assessment and the delivery of sustainable conservation outcomes.

7.9. Designated Sites

Statutory Designations

- 7.9.1. Given the distance to the statutory designated sites in the locality, the closest being Lousehill Copse LRN, 2.6km to the west of the site, the intervening land use, and the nature of the proposed development, significant adverse effects are not likely and there is no requirement for any mitigation measures.

Non-statutory Designations

- 7.9.2. Holy Brook LWS is situated 0.3km to the south of the site, beyond the A329. Significant adverse effects on the LWS as a result of the proposed development are not likely; given the presence of the dual carriageway and other existing development, there is no possibility of direct encroachment and indirect effects, such as dust deposition, are unlikely given the need to control such effects in line with industrial standards.

Ancient Woodland and Off-site Priority Habitat

- 7.9.3. Given the distance to the Ancient Woodland and Priority Habitat in the locality, the intervening land use and the nature of the proposed development, significant adverse effects are not likely and there is no requirement for any mitigation measures.

7.10. Habitats

- 7.10.1. The site is virtually devoid of habitats of ecological interest. The introduced shrubs and modified grassland have some very limited value; most of these features are to be lost. All of the London Planes trees and three of the Lime trees are to be retained as part of the proposed development, but the remaining four Lime trees are due to be removed. A small non-native tree at the front entrance of the Police Station will also be removed. The retained trees will need appropriate space to be able to provide the required canopy cover and maintain their root systems, as mentioned in the Tree Report and to adhere to BS 5837 2012.
- 7.10.2. The landscape scheme for the proposed development includes six new trees planted along Castle Street to replace the removed trees, as well as adding green roofs and a podium communal courtyard on the new building. These features will offer new opportunities for wildlife, once established.

Non-native Invasive Species

- 7.10.3. As Cotoneaster has been recorded within the site, it is advised that this plant should be removed in a controlled manner, adhering to biosecurity methodology, and disposed of at a licensed site.

7.11. Biodiversity Net Gain

- 7.11.1. As of February 2024, Biodiversity Net Gain is a mandatory requirement under the Environment Act 2021 for the majority of new major planning applications. The site does not qualify for an exemption under The Biodiversity Gain Requirements (Exemptions) Regulations 2024.

- 7.11.2. The Biodiversity Net Gain Assessment and Statutory Metric for the proposed development are detailed in a separate report.

7.12. **Bats**

- 7.12.1. All bat species are fully protected by the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (as amended). Taken together, applicable offences include killing and injury; disturbance; damage and destruction of breeding or resting places; or obstruction of access to a place used for shelter or protection. The protection afforded to these places applies at all times, including when bats are not present.
- 7.12.2. The site shows no sign of significant use by bats and is of negligible value to foraging bats, comprising hardstanding with small areas of modified grassland and introduced shrubs. The habitats immediately outwith the site boundary are of similar low interest, comprising major roads and residential development. However, the site and surrounding area have been shown by the data search to be used by a complement of largely common and widespread bat species. It is recommended that the habitat that is onsite be maintained and, if possible, improved, so as to continue to provide a habitat corridor for foraging bats.
- 7.12.3. No trees with the potential to be adversely impacted by the proposals were identified as supporting potential roosting opportunities for bats.
- 7.12.4. The lighting strategy will have full regard to the guidance from the Bat Conservation Trust and the Institution of Lighting Professionals. Trees will not be lit, and steps will be taken to limit light spill in other areas. Bollard lighting should be specifically avoided. It is noted that existing lighting will also come from the immediate surroundings, such as the roads and adjacent amenity buildings and residential development.
- 7.12.5. To provide suitable roosting opportunities, a series of bat boxes will be provided on trees within the site boundary. Locations will be agreed with an Ecologist.

7.13. **Birds**

- 7.13.1. Section 1 of the Wildlife & Countryside Act 1981 (as amended) is concerned with the protection of wild birds. With certain exceptions all wild birds and their eggs are protected from intentional killing, injuring and taking, and their nests, whilst being built or in use, cannot be taken, damaged or destroyed.
- 7.13.2. Schedule 1 Part 1 of the Wildlife & Countryside Act 1981 is a list of the nationally rarer and uncommon breeding birds for which all offences carry special (i.e. greater) penalties. These species also enjoy additional protection whilst breeding, as it is also an offence to disturb adults or their dependant young when at the nest.
- 7.13.3. A small number of common bird species were recorded during survey work. The site is overall of low value for nesting and foraging birds, with habitats of greater value available further afield.
- 7.13.4. Any necessary removal of suitable nesting habitat (i.e. the trees and introduced shrubs) would be undertaken outwith the nesting bird season (March to August inclusive) to avoid a possible offence under the legislation. Where this cannot be achieved, a check survey for nesting birds

would be undertaken by a suitably qualified ecologist, with any confirmed nests protected with a 5m radius buffer, delineated using hazard tape and left in situ until the young have fledged.

- 7.13.5. The landscape scheme could provide new nesting and foraging opportunities for birds. The applicant will consider opportunities for installing new nesting opportunities for birds, including Swift *Apus apus* bricks and tree-mounted nest boxes.

8. Conclusions

- 8.1. In conclusion, there is no overriding ecological reason why the site should not be developed. The site is virtually devoid of habitats of ecological interest, both intrinsically and in terms of the opportunities they offer to wildlife. The ornamental vegetation and grassland will be lost, but the landscape scheme associated with the proposed development will provide new opportunities. Five trees will be lost, but six new trees are proposed to be planted.
- 8.2. Limited use of the site by foraging / commuting bats has been identified. The introduced shrubs offer some limited habitat for foraging and nesting birds. The measures proposed within this report would offset potential adverse effects. Opportunities for enhancement, through the landscape scheme and through specific roosting and nesting features, have been set out. A suitable lighting scheme will be brought forward, having full regard to best practice.
- 8.3. Overall, the proposed development is in line with planning policy, with respect to ecology and biodiversity, and with relevant legislation.

9. References

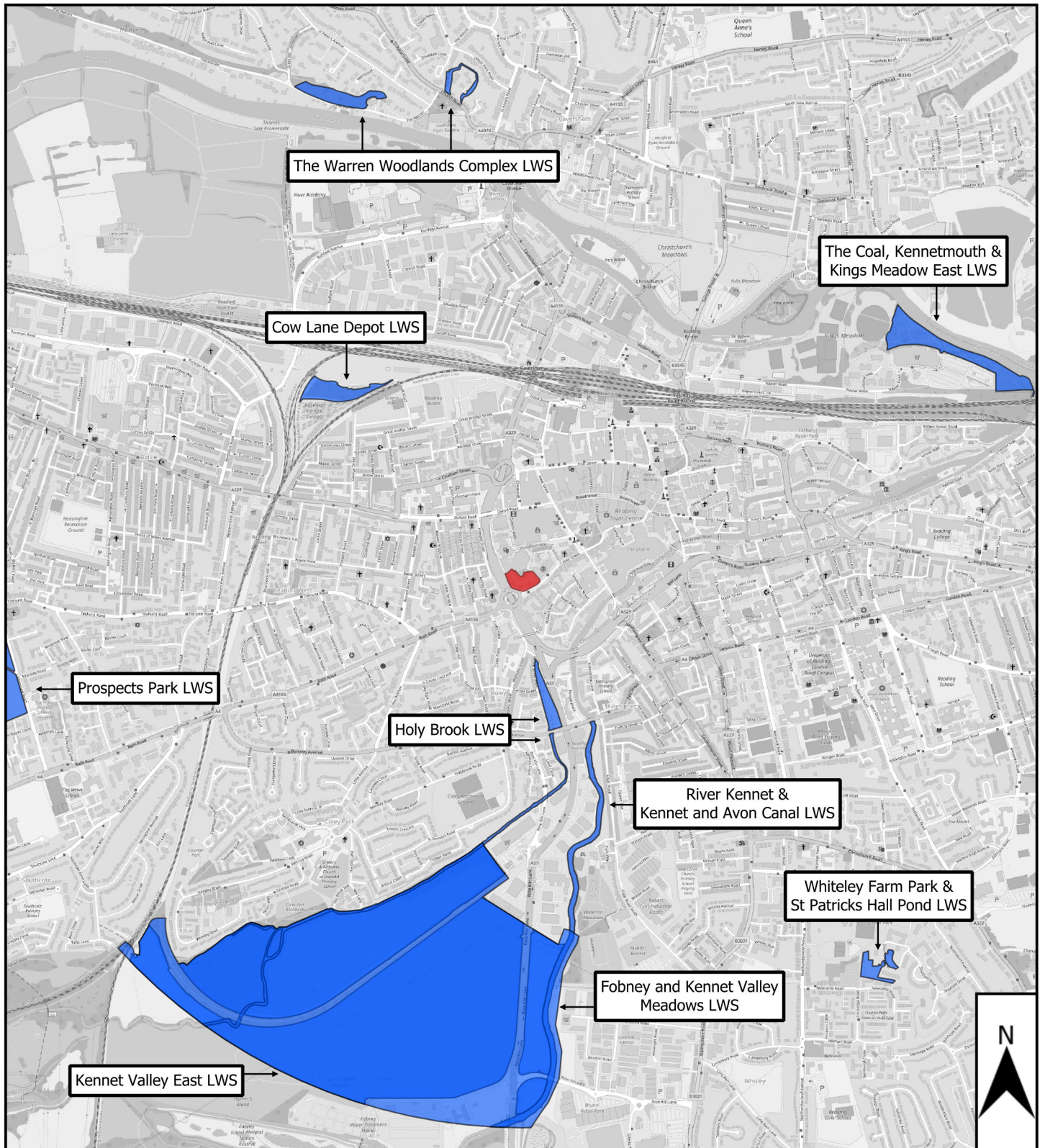
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FIGURE: 1

TITLE: Site Location and Ecological Designations

REFERENCE: 1083.EcAs.01



Key:

- Site Boundary
- Local Wildlife Site (LWS)

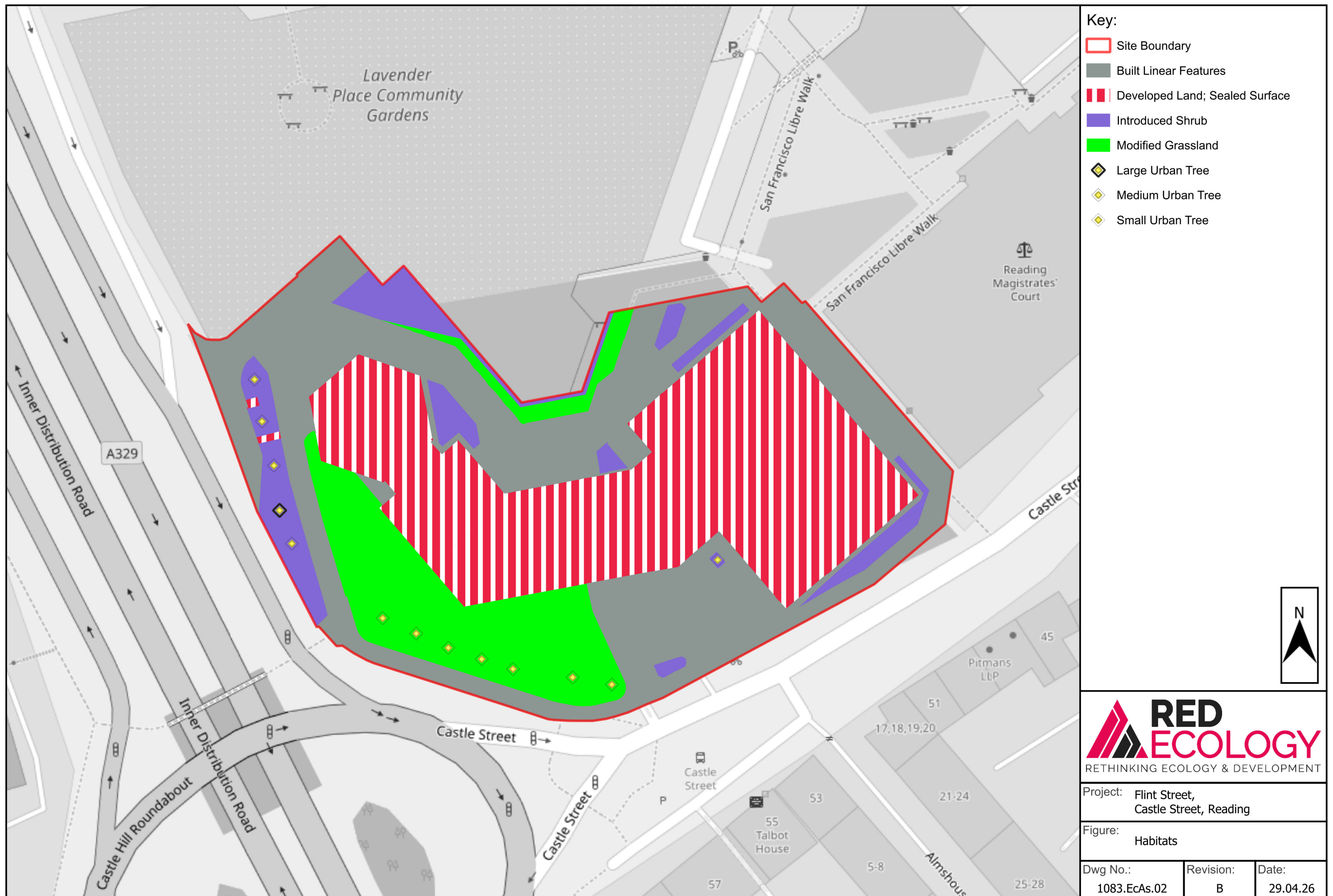


Project: Flint Street, Castle Street, Reading		
Figure: Site Location and Ecological Designations		
Dwg No.:	Revision:	Date:
1083.EcAs.01	A	16.01.26

FIGURE: 2

TITLE: Habitats

REFERENCE: 1083.EcAs.02



APPENDIX: 1

TITLE: Site Photographs

Site Photographs



1. Reading Police Station south.



2. Reading Police Station west.



3. Reading Police Station northwest.



4. Reading Police Station northeast.



5. Reading Police Station east.



6. Reading Police Station interior.



7. Reading Police Station interior.



8. Reading Police Station interior.



9. Reading Police Station basement car park.



10. Example of Ornamental Planting.



11. Overhead view of rear planting and grassland.



11. Modified grassland and Lime trees.



13. View of Lime trees from roundabout.



14. View of London Plane trees from roundabout.



info@redecology.com
www.redecology.com

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