

## Summary

Potential ecological issues include bats, nesting birds and biodiversity net gain.

## Bats

An updated bat assessment has been provided. This found no change in circumstances since the previous survey in 2022. As no bats were found in 2022, rather than provide updated dusk surveys, precautionary working measures have been recommended. This is however a high-risk location, with a number of bat roosts found in similar buildings along Hawkshaw Lane and the level of disturbance increased from conversion to demolition and rebuild. It is unclear from the minor amendments to the 2022 report, whether the consultant is aware that the level of impact has increased. Current guidance also recommends that for reports greater than 3 years old a new report is provided, not minor amendments to the previous report. The 2022 report was over 3 years old at the time of the 2025 survey.

*I therefore recommend as a minimum that the report is rewritten with reference to the new development as opposed to the 2022 conversion and that at least one dusk survey is carried out prior to demolition. If the consultant is satisfied that the risks are very low, this could form part of the precautionary working method statement.*

## Nesting Birds

Previously evidence of nesting birds has been recorded. I therefore recommend a condition along the following lines is applied to any permission.

*No building works or demolition shall commence between the 1<sup>st</sup> March and 31<sup>st</sup> August in any year unless a precautionary working method statement for nesting birds by a suitably experienced ecologist has been supplied to and agreed in writing by the LPA.*

## Contributing to and Enhancing the Natural Environment & Biodiversity Net Gain (BNG)

Section 187 of the NPPF 2024 states that the planning policies and decisions should contribute to and enhance the natural and local environment. 10% BNG is mandatory under Schedule 7A of the Town & Country Planning Act 1990 (as inserted by schedule 14 of the Environment Act 2021).

The development will result in the overall loss of one building to hard and soft landscaping, with potential wildlife issue including loss of potential bat roosting and bird nesting opportunities.

The developer has claimed exemption from BNG under the de minimis rule. This is not clear cut as around 100sqm of vegetated habitat is present within the red edge on aerial imagery, the majority of which will be turned in to garden.

I am satisfied that 10% net gain will be achieved as the area of garden proposed will exceed the area of what appears to be disturbed ground/low value grassland that will be lost by around 50% and I assume that in reality the existing grassland is only temporarily lost/disturbed during construction and therefore in reality retained based on BNG guidance relating to temporary losses, though also technically lost owing to change of use from modified grassland to lawn when input in to the defra metric.

I will therefore leave it to the LPA to decide whether it is reasonable to request a BNG assessment for such a minor potential exceedence of the de minimis rules where, 10% is clearly achieved and no HMMP will not be required as no significant habitat are being created as defined by defra. Note if the development is self-build it is also exempt.

I recommend provision of bird and bat boxes on the new build. *The details can be provided via condition.*

**Ecologist**

Planning and Transportation