

72968 – Whitefield Library

GMEU Comment:

Dear Helen,

Thank you for consulting GMEU on this application at Whitefield Library, for change of use of former library to provide a health centre (Use Class E(e)), together with associated external alterations, car parking provision, landscaping, and engineering works. The ecology documents that I have referred to in these comments are:

- Preliminary Ecological Appraisal and Roost Assessment, July 2025 (ArbTech);
- Biodiversity Net Gain Assessment (BNGA), March 2026 (ArbTech); and
- Bat Emergence and Re-Entry Surveys (BERS), October 2025 (ArbTech).

Based on these documents, and the other plans submitted in relation to this application, I have the following comments:

Bats

Two buildings, B1 (Library) and B2 (Garage) were assessed for bat roosting potential. Both B1 and B2 were assessed to have 'low' bat roosting potential, and therefore bat emergence surveys were conducted.

As per the Bat Surveys for Professional Ecologists Good Practice Guidelines (2023), surveys of 'low' bat roosting potential require one emergence survey between May-August inclusive. The PEA also stated that 'This survey visit should be completed during the optimal survey period mid-May to August inclusive. Sub-optimal: early May and September. Would require greater justification of timing e.g., weather conditions, known local bat activity.'. The bat emergence surveys were completed on 30th September 2025, outside the recommended timeline suggested for 'low' bat roost potential buildings, and I cannot see any justification or limitations about this in the emergence survey report. Please could the ecologist provide justification about the timing for this survey?

Nesting Birds

There is habitat suitable for nesting birds present on the site on the building and within vegetation. Work that will impact on habitats where nesting birds may be present (for example building works), should not be undertaken in the main bird nesting season (March – August) unless suitable checks for active bird nests have been undertaken. We would suggest that a condition to this effect be placed on any permission.

Planning policy encourages enhancements and net gains for biodiversity to be delivered through the planning system. Wherever possible, measures to enhance the site for biodiversity should be secured as part of this planning application and should include integration of at least two bat boxes and at least two bird boxes onto the building or

suitable trees on-site, prior to habitation of the building, which should be secured via condition, to provide biodiversity enhancements.

Other Protected Species

Precautionary Working Methods for hedgehogs, reptiles and amphibians should be followed during development, as per page 10, 11 and 13 of the PEA, which should be secured via a condition. We would also suggest that hedgehog highway holes are inserted into any fencing on-site to allow hedgehog to move through the site, which should be secured via a condition.

Protected species can turn up in unexpected places, and the granting of planning permission does not negate the need to abide by the laws which are in place to safeguard biodiversity. An informative should be used so that the applicant is aware that they must seek ecological advice should they find or suspect that the proposals will impact on protected species.

Biodiversity Net Gain (BNG)

I have a few queries for the ecologist with regards to the BNG:

- The BNGA mentioned that the report should be read in conjunction with the Tree Survey Report by ArbTech, however I cannot find this document. Please can you confirm if this document is applicable for the application?
- Within the Arboricultural Impact Assessment, T012 (a Sycamore), seems to be included within the redline boundary, but has not been included within BNG calculations, please could the ecologist confirm if this should be included?

To summarise, further information is required (with regards to the bat survey and BNG), prior to determination of the application.

Kind regards,

Abbey