

Dear Jennie,

Thank you for consulting GMEU on this application at 299 Middleton Road, for the demolition of existing dwelling and erection of 1 no. replacement dwelling. The ecology document that I have referred to in these comments is:

- Bat Emergence Survey Report, July 2026 (Ecology 360)

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

Bats

The Preliminary Roost Assessment assessed the building to be demolished as 'moderate' bat roosting potential, and therefore two emergence surveys were conducted. The first emergence survey states it was completed on the 8th May 2026 (subtitle), or the 8th June 2026 (in the body of the text). Please could this be rectified within the report?

The bat emergence surveys were undertaken on the building, during which no bats were found to be roosting within the building. The survey was undertaken in accordance with best practice guidelines, and I therefore have no reason to doubt the results. As such, no further surveys or licences are required, though I would recommend that an informative along the following lines is attached to any permission, if granted:

- *Whilst the works to the existing building have been assessed as very low risk for bats, the applicant is reminded that under the Habitat Regulation it is an offence to disturb, harm or kill bats. If a bat is found all work should cease immediately and a suitably licensed bat worker employed to assess how best to safeguard the bat(s). Natural England should also be informed.*

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 the integration of at least one bat box and at least one bird box onto the new building, prior to habitation, to provide biodiversity enhancements, which should be secured via a condition.

We also recommend that any new external lighting must be designed in line with best practice guidelines (e.g. <https://www.bats.org.uk/our-work/buildings-planning-and-development/lighting>) to avoid impacts on nocturnal animals such as bats (as per Appendix B of the Emergence Survey Report) which can be secured via a condition.

Nesting Birds

There is no habitat suitable for nesting birds present in the dwelling, however the garden could support nesting birds. Work that will impact on habitats where nesting birds may be present (for example building works near to vegetation, or vegetation removal/works), should not be undertaken in the main bird nesting season (March – August) unless suitable checks for active bird nests have been undertaken. This should be secured via a condition.

Other Protected Species

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)

The Application Form states that the application is exempt from mandatory BNG due to the *de minimis* exemption as it is a replacement dwelling and therefore exempt. However, the Application Form also states that there are no trees or hedges on-site, but from a review of Google Maps and Google Earth, it seems that there is a hedge on-site at the front of the

property, and a tree and vegetation to the rear. The hedge may be removed for the proposed development, and as the new property will be larger, it is likely some vegetation will be removed. Please could the applicant confirm the proposed plans with regards to the vegetation on-site?

Kind regards,
Abbey

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Please note, my working days are Monday-Thursday.
Upcoming Annual Leave: 1st-10th September



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