

GMEU – updated response 22/9/23

Summary

The presence of a bat roost has been confirmed.

Bats

Two emergence surveys have been provided late in the survey season, one within the optimal period and the other outside this period but at a time bats would still be active. Common pipistrelle bats were confirmed as roosting in the building in low numbers. The consultant has therefore concluded that the house is used as a day roost for small numbers of this species. I have some doubts that this has been conclusively proven given the lateness of the surveys which will have potentially missed peak numbers utilising the house ie a larger more important roost may have been present earlier in the summer which was on the point of breaking up when surveys commenced. This is in part supported by the significant number of bat droppings found during the bat assessment, though it also would support the theory of regular use by small numbers of bats, particularly if the bat droppings represented a wide range of ages.

From the LPA perspective we need to decide whether or not it would be reasonable to request further bat survey information, which now could not occur until next Spring. We should only do this if we believe there is a risk of a roost that could not be mitigated ie a very large high value roost was present such as maternity or hibernation roosts.

The evidence does not support this though a maternity roost could theoretically be present. However, given that it would need to be an extremely large common pipistrelle maternity roost to be of district or regional significance ie be a reason for refusal on the grounds of adverse effects to a European Protected Species and the surveys have been carried out within current guidelines, I believe it would be unreasonable to request further surveys. I therefore accept that planning permission can be granted subject to provision of a bat license issued by Natural England. I therefore recommend a condition along the following lines is applied to any permission.

The demolition of the existing dwelling is likely to cause harm to common pipistrelle bats as identified in the Bat Emergence Surveys, Rachel Hacking Ecology Ref: RHE.3867 and shall not in any circumstances commence unless the local planning authority has been provided with either:

- a) a license issued by Natural England pursuant to Regulation 55, of the Conservation of Habitats and Species Regulations 2017 authorising the specified activity/development go ahead: or*
- b) a statement in writing form the relevant licensing body or LPA to the effect that it does not consider that the specified development will require a license*

I also recommend that updated emergence surveys are provided if demolition is delayed beyond April 2025. *This can be conditioned.*

Contributing to and Enhancing the Natural Environment

Section 174 of the NPPF 2021 states that the planning policies and decisions should contribute to and enhance the natural and local environment. Mitigation for loss of bat roosting habitat will be determined by Natural England. The LPA can however recommend additional enhancement measures for bats. I therefore recommend a condition along the following lines is applied to any permission.

Prior to occupation bird nesting and bat roosting mitigation and enhancement measures, including one additional bat box beyond that required for the bat mitigation license will be provided to and agreed in writing by the LPA

Ecologist

Planning

Planning and Transportation

Place