

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 one bat emergence survey was conducted.

The bat emergence survey was conducted on 30th September 2025 and found no bats emerging or re-entering either building. Confirmation around the timing for the emergence survey was provided within the limitations section of the updated Bat Emergence Survey Report (April 2026) after a query from GMEU, however it should be noted that the Bat Surveys for Professional Ecologists Good Practice Guidelines (2023) state that surveys of 'low' bat roosting potential require one emergence survey between May-August inclusive. As the survey was conducted outside the recommended survey season, we would recommend that a Method Statement is used during development, to protect bats, which should be secured via a condition.

No further surveys are required, however, as bats are mobile creatures, we also recommend that the following informative is attached to any planning 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.

Biodiversity Net Gain (BNG)

I have one final query with regards to the BNG Report. Within the BNG Report (Page 9) the table states that the proposed condition of the created modified grassland is 'good', however within the metric this is 'moderate'. We would recommend that 'moderate' is more feasible. Please could this be updated in the BNG Report to align with the BNG Metric?

A BNG Metric has been submitted, which shows a loss of 0.15 units (-7.89%) to be incurred on site. To achieve a net gain of 10%, 0.34 units are required. GMEU agree with the proposal that off-site units are purchased from a nearby habitat bank.

The on-site gains are not considered to meet the criteria of 'significant on-site enhancements' and therefore a simple management plan (such as a LEMP) should be submitted for the management of the habitats, and the gains can be secured by condition. A full 30-year Habitat Management and Monitoring Plan (HMMP) is not considered to be required.

The statutory Biodiversity Gain Condition will apply should this planning application receive permission. To discharge the condition, the following is required: a Biodiversity Gain Plan (using the DEFRA template), final version of the BNG metric (including on-site and off-site information), plus evidence of the offsite provider (including gain site reference and units purchased). The off-site information in the final BNG metric must be filled in by the off-site provider. Please see [Biodiversity net gain - GOV.UK](https://www.gov.uk/guidance/biodiversity-net-gain) for how this should be dealt with on the decision notice.