

Summary

Potential ecological issues include bats, nesting birds and mitigation for loss of trees and shrubs.

Bats

The buildings were assessed for bat roosting potential and all buildings were assessed as low risk for bats. One emergence survey was carried out late in the bat survey season. No evidence of bats emerging was recorded. I have no reason to doubt the findings of the report.

The emergence survey was however outside the optimal period for bat emergence surveys and guidance for low risk structures which recommends that the one survey required should be during the optimal time period. I therefore do not agree with the conclusion that no further information or measures are required, as the GMEU stopped automatically accepting emergence surveys after mid-September last year. We also hold two bat roost records for this estate, (which is in accordance with the consultant's findings that bats were active on the site close to when bats would be expected to emerge).

We are now in the peak bat activity season therefore I would recommend a further emergence survey prior to determination, to remove any doubt. I am however willing to accept that the evidence points to very low risk buildings and therefore precautionary measures could be put in place via condition. This would include a precautionary emergence survey prior to demolition. (Hence in part my recommendation to carry out the survey now to prevent the need for a prior to condition and remove the risk of extra delays if demolition was scheduled outside the bat emergence season).

I therefore recommend that prior to determination a further dusk survey occurs, but if the demolition is unlikely to occur until after May 2024 a precautionary condition could be applied.

Nesting Birds

Trees and shrubs will be lost, potential bird nesting habitat. All British birds nests and eggs (with certain limited exceptions) are protected by Section 1 of the Wildlife & Countryside Act 1981, as amended. I recommend a condition along the following lines be applied to any permission.

No works to trees or shrubs shall occur between the 1st March and 31st August in any year unless a detailed bird nest survey by a suitably experienced ecologist has been carried out immediately prior to clearance and written confirmation provided that no active bird nests are present which has been agreed in writing by the LPA.

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. The development site is primarily hardstanding with buildings. The majority of the boundary trees will be retained. The proposed layout will still consist primarily of hardstanding with buildings, but the percentage as soft landscaping will be increased and more than adequate numbers of replacement trees provided. Bird and bat boxes are also proposed. *I therefore accept that the development will likely result in biodiversity net gain and that the soft landscape proposals can be conditioned.*