

## Supplementary Bat & Ecology Note

Former Friends School, Saffron Walden

July 2022

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### 1.0 Introduction

- 1.1 This note has been prepared by CSA Environmental on behalf of Chase New Homes in relation to Former Friends School, Saffron Walden (hereafter referred to as 'the Site'). It provides a summary of a supplementary Preliminary Roost Assessment (PRA) for bats and emergence survey undertaken of the on-site Craft, Design and Technology (C.D.T) building (hereafter referred to as B12) in July 2022. In addition, clarification is provided with regard to felling of trees for bats, as well as in respect of proposed ecological mitigation and enhancements.
- 1.2 Residential development is proposed at the Site, for which detailed planning permission is sought (reference UTT/22/1040/PINS - currently under consultation).
- 1.3 A consultation response letter received from Place Services (20 July 2022) noted "We are still not satisfied that there is sufficient ecological information available for determination of this application. Although we have had clarification on the bat roosting potential of the trees and some of the buildings, we are not satisfied that building B12 has had sufficient coverage during the bat emergence surveys.

*Table E.1 of the Ecological Impact Assessment (CSA Environmental, February 2022), previously reviewed, states that air vents on the eastern and western gables ends of the pitched roof provide potential access points for bats. The roof void of this section of the building was also said to be inaccessible. The Bat Survey Results Plan, drawing number CSA/4017/106 does not show a surveyor covering the western aspect of building B12. The reference to the air vents on the western gable has now been removed from the updated Ecological Impact Assessment (CSA Environmental, June 2022) despite the air vents being present on the western aspect (as seen from Google Street View, accessed July 2022). Justification as to why the western aspect of B12 was not surveyed has not been provided.*

*Further information as to why the western aspect of building B12 was not surveyed or results of appropriate emergence/re-entry surveys, in line with best practice guidance (Collins, 2016), should be provided."*

- 1.4 In addition, the following was stated in respect of bats and trees, and subsequently in respect of ecological mitigation and enhancements:

*"In addition, Table E.2 shows that three of 27 trees to be removed have low potential to support roosting bats, therefore paragraph 5.12 is incorrect when it states that 'all trees with potential to support roosting bats are to be retained...'. Trees with low potential to support roosting bats do not require further surveys to be undertaken on them but should be soft-felled to protect any bats that happen to be roosting within them at the time of felling, in line with best practice guidance."*

*"Bat loft voids should be incorporated into the mitigation strategy on site."*

*"It is recommended that further bird and bat boxes could be installed on site with integrated boxes installed on new buildings. Integrated Swift boxes should also be considered where possible. Log piles to enhance the site for sheltering mammals, amphibians and invertebrates should also be provided."*

- 1.5 This note should be read in conjunction with the 'Ecological Impact Assessment – CSA Environmental (CSA/4017/04, Rev B, June 2022)' and previous response to consultations, which provides further details of all ecological survey work undertaken at the Site, along with recommended mitigation and enhancement measures.

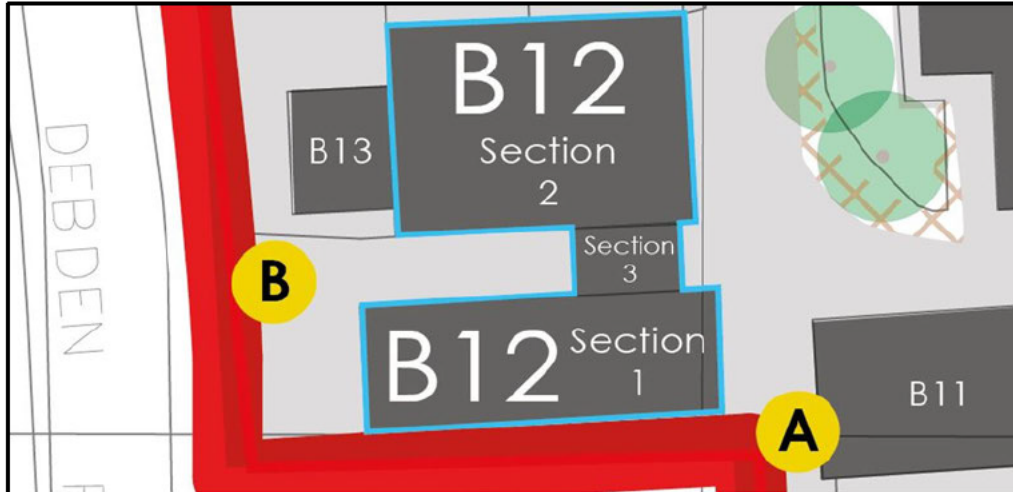
## **2.0 Building B12**

- 2.1 To satisfy the above consultation response, a supplementary Preliminary Roost Assessment (PRA) and emergence survey of B12 was undertaken on 27 July 2002 by Carly Howes ACIEEM (Bat Class Survey Licence 2021-55125-CLS-CLS) and Laura Farrar (Bat Class Survey Licence 2020-44517-CLS-CLS).
- 2.2 The PRA and emergence survey followed standard survey methods, design, data analysis and interpretation, and were undertaken with due consideration of the Bat Conservation Trust (BCT) guidelines 3rd Edition (Collins, 2016). Full details of survey methods and analysis can be found in Appendix E of the EclA report (CSA/4017/04), submitted as part of the application.
- 2.3 There were no limitations to the internal building inspection or emergence survey. Some dense bramble growth was present against the southern elevation of B12 which obstructed the view of much of the exterior wall. Whilst this vegetation may in principal obscure potential roost features the vegetation, it would itself have precluded bats from using or finding features present.

## Update Preliminary Roost Assessment

- 2.4 No evidence of bats was noted anywhere within B12 (Section 1, 2 and 3).
- 2.5 Building B12 is formed of three single-storey sections of differing construction types. The largest section (Section 1) is brick-built, with a single pitched roof covered in flat clay tiles, with a skylight on the northern elevation, and is the focus of the assessment set out herein.

**Plate 1.** Building B12 (outlined blue), showing section 1, 2, and 3 with surveyor locations for emergence survey shown in yellow ('A' & 'B')

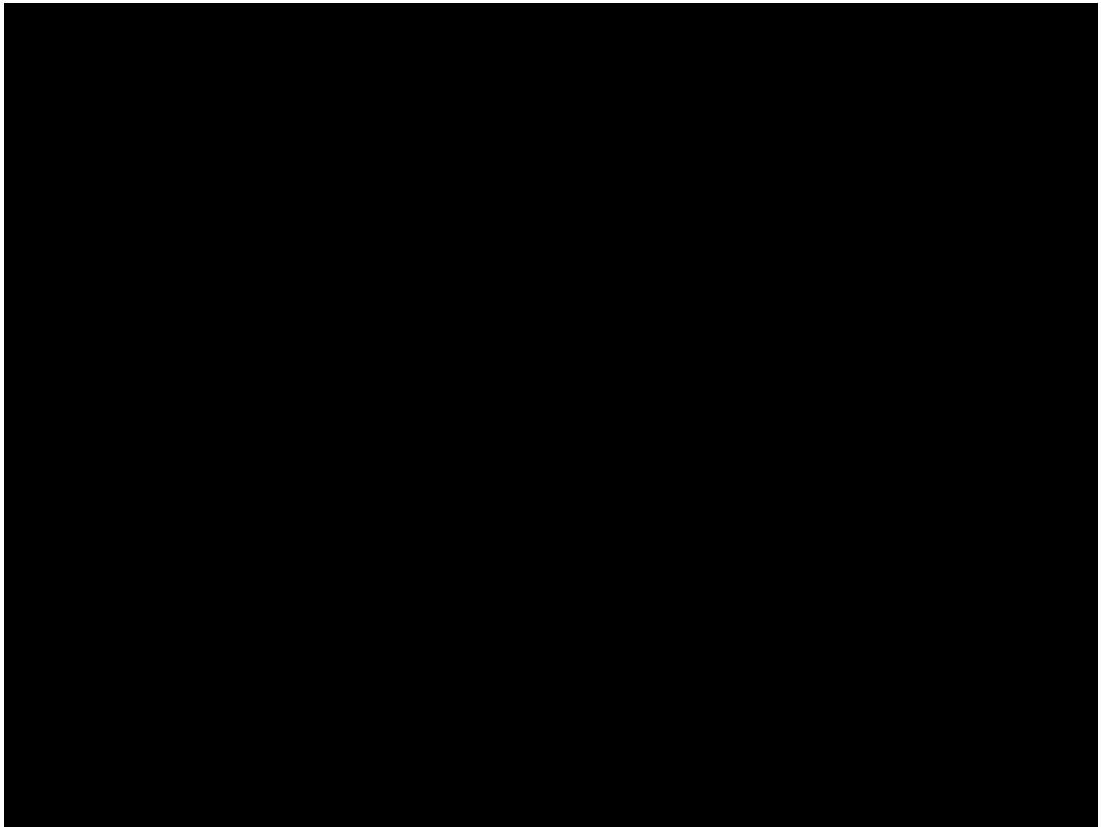


- 2.6 Building Sections 2 and 3 have flat ceilings, also lined with panel boards, and the walls have been plastered. Peeling paint is visible in places, however no substantial bat roosting potential was noted as a result.



**Photograph 1** Northern elevation of Section 1 with skylight. Note roof with tightly fitted tiles across the majority of the roof.

2.7



**Photograph 2** Northern elevation of Section 1. Small number of slightly lifted/ tiles c.<2cm gaps



**Photograph 3** Southern and eastern elevation of Section 1. Note roof with tightly fitted tiles across the majority of the roof. Note bramble cluttering potential roosting opportunities/clear flight path.

- 2.8 Overall, the masonry of B12 appeared in good condition, with no cracks/crevices providing possible roosting sites for bats.



**Photographs 4 & 5** Air vents (on both eastern and western gable ends of Building B12). Obstructed and cobwebbing noted.

- 2.9 Air vents are present on the eastern and western gable ends of Section 1, above small circular windows. These vents appeared to be internally obstructed with insulation and other materials and were also heavily cobwebbed from both sides indicating unlikely use by bats. This obstruction effectively prevents bats from accessing the single room present in B12 (Section 1).
- 2.10 Section 2 of the building is also of masonry construction, formed of large pebble-dashed breeze blocks. This section has a flat roof formed of large concrete slabs. No roosting features were noted within part 2 of the building.
- 2.11 The third section connects parts 1 and 2 and has a flat lead sheet roof. The sides of this section of building are clad in timber weather boarding which is tightly fitted and does not provide any roosting features.
- 2.12 Internally Section 1 of B12 is open, clean and well-lit with several large windows, skylight and circular windows. Section 1 has a vaulted ceiling, with timber beams and rafters visible. The ceiling is lined with large, tightly fitted plastic composite panel boards, which do not provide any roosting features. The interior walls are not lined, with the breeze block construction visible throughout, and no internal crevices are present. This space therefore being very well lit is largely unsuitable for bats to roost during daylight hours and no evidence of bats was found.

- 2.13 A loft space was previously assumed and reported to be present within Section 1. However, the PRA survey confirms no loft voids are present within B12.
- 2.14 Sections 2 and 3 have flat ceilings and are lined with panel boards, and the walls have been plastered. Peeling paint is visible in places, however no substantial bat roosting potential was noted as a result.
- 2.15 All windows and doors of B12 appear tightly fitted and in reasonable condition.

#### Emergence Survey

- 2.16 No bats were recorded to emerge from Building B12 (section 1), with surveyors able to view all elevations of the building. Low numbers of common pipistrelle *Pipistrellus pipistrellus* were recorded during the survey.

#### Discussion

- 2.17 Based on both the updated PRA and emergence survey **no evidence of bats/bat roosts was confirmed within B12.**
- 2.18 Following the update PRA, Building 12 is **re-assessed to have low potential to support roosting bats** given the following:
- There is no roof void space in building B12 (section 1)
  - There are effectively no access opportunities for bats to enter the single internal room of building B12 (section 1), given obstructed nature of air vents
  - The single internal room within B12 is entirely unsuitable for bats to roost during daytime, being well-let with no internal crevice features
  - Roof tiles are tightly fitted overall, with a very small number (<5) slightly slipped providing narrow aperture crevices
- 2.19 **No bats were found to emerge from B12** during the survey. Bat activity during the emergence survey was very low, comprising small numbers of common pipistrelle bats.
- 2.20 Having completed one full nocturnal survey, and covering all elevations, in addition to previous survey work carried out in 2020, it can be **reasonably proven that the building does not support any bat roosts** based upon BCT guidelines.
- 2.21 Based upon the above, it is therefore asserted that there is sufficient information to determine the application in respect of bats.

### **3.0 Bats & Trees**

- 3.1 The previously submitted results of the Preliminary Roost Assessment of Trees (Appendix E of the EclA report, Rev B, June 2022) found that of the 27 trees proposed for removal on site, three were assessed to be of **Low**

potential to support roosting bats [REDACTED]. These trees should be soft felled under the supervision of a suitably qualified ecologist. All limbs should be lowered safely to ground after removal and maintained in an upright position until an ecologist is satisfied no bats are present within any suitable roosting features. The tree removal works should be undertaken in September/October or March/April where possible, to avoid hibernation and breeding season.

#### **4.0 Ecological Mitigation & Enhancement Measures**

- 4.1 Consultation from Place Services have recommended that a bat loft void should be incorporated into the mitigation strategy on site. A bat loft void is very unlikely to be requested for by Natural England for loss of a small brown long-eared bat roost of low conservation significance. Therefore, a bat loft is proposed at this time.
- 4.2 Further bird and bat boxes have been recommended within the consultation response. At least eight bat and eight bird boxes (including swift bricks) were recommended within Paragraph 5.27 of the EclA report (CSA/4017/104 Rev B). The exact number and product type of bird and bat boxes to be provided within the external walls of new buildings can be secured by condition or other appropriate mechanism.
- 4.3 Further comments have been provided with regards to log piles. Previous reports have stated that three log piles are to be created from timber generated from tree clearance works at the Site (Paragraph 5.27).