

21st June 2016

Ms S Carr
Planning Officer

Dear Seonaid

Precautionary Method Statement 2016/3069/P

I would like to raise the following objections to the Mount Anvil, Kings College, Kidderpore Avenue Precautionary Method Statement on bats.

- The Method Statement is based on a preliminary survey conducted by the Ecology Consultancy in July 2014 (almost two years ago). The original survey neglected to assess the majority of buildings internally, as well as 8 trees due to size, dense foliage or ivy. The Dusk Emergence and Dawn re-entry surveys conducted in July/August 2014 had the objective of assessing the buildings only for bat roosts, the trees with bat roost potential were not included in the scope. This has been supplemented by a “walkover” of the site in April 2016 whilst bats are still hibernating. It is not clear what the “walkover” included of whether it was conducted at a time of day when bats might be present.
- CPG3 clearly states that Ecological survey data is considered valid for a period of 1 year only therefore the proposed method statement is based on potentially invalid and incomplete data. There is no current or valid data on the wider ecology of the site.
- The Method Statement fails to meet good practice standards• in a number of areas:
 - (a) The author does not identify his qualifications - there is no evidence that this has been produced by a suitably qualified ecologist
 - (b) The method statement has not been peer reviewed
 - (c) The identity, qualifications and methodology used by the individual(s) who conducted the “walkover” have not been specified
 - (d) Under UK law there are four different levels of class license for bat inspections - the method statement needs to verify that ecologists involved will have the appropriate level of licence and qualifications this should be specified.
 - (e) The method statement fails to take into account the Zone of Influence (this is also a failing of the Preliminary Survey and dusk emergence surveys). Zone of influence is defined as “The area/resources that be affected by the biophysical changes caused by activities associated with the project” (CIEEM 2016)
 - (f) Age of previous survey data - should relate to the last season the survey on which this method study is based is two years old and will be older than that when demolition is completed in September 2016
 - (g) No reference is made to the time of year of weather conditions for internal and tree inspections as this will impact bat activity (this is also an omission from the July 2014 survey). Good practice would recommend that winter is the best season for tree surveys.
 - (h) There is insufficient detail as to what areas will be internally inspected e.g. Chimney Breasts, lintels above doors and windows, roof timbers, lofts etc
 - (i) The reference to best practice guidelines (Collins 2016) has not been substantiated

•Good practices as outlined in *Bat Conservation Trust Bat Surveys for Professional Ecologists Good Practice Guidelines March 2016*

- A bat roost (common pipistrelle) was identified by the Ecology Consultancy on the South Side of Kidderpore Avenue less than 50m south of the Kings College site in 2014. In addition since

- the Ecology Consultancy's survey, RedFrog have commissioned their own bat survey, which took place in May 2016. This gives clear confirmation of the presence of bats in the Vicarage in Kidderpore as well as 9 Kidderpore. We have yet to establish whether there are bats roosts at these locations, however a number of trees indicate positive indicators for bat roosts. It is likely that Kidderpore is part of bat foraging route which stretches from Heath Drive, Redington and Briardale Gardens. Evidence for bats at all these locations has been recorded by Dr Greg Carson CEnv MCIEEM of the Ecology Network.
- The method statement makes no reference as to how bats and other species will be protected (including from dust and particulates) in buildings and gardens that about the Kings College Site (CPG6 Sustainability). The August 2014 report by the Ecology Consultancy states:

The survey findings have, however, identified that roosts are present in the immediate vicinity of the site (notably the southern boundary). Under current legislation it is an offence to disturb roosting bats; this would include disturbance to bats in local roosts, where these are close enough to be potentially affected by the proposed works. Therefore, some mitigation measures would be required to minimise the disturbance of the works upon these roosting bats **(4.6 The Ecology Consultancy Bat Presence or Likely Absence Survey August 2014)**

- This is also relevant to the Vicarage (a potential site for bat roosts) which adjoins the Queen Mother's Building due to be demolished. How will these roosts be protected? What mitigation measures will be put in place?
- Condition 33 requires Mount Anvil to present a method statement for a precautionary working approach to demolition and construction. There is a requirement to ensure that site operatives must be made aware of the presence of protected species during works. The method statement submitted only addresses bats, there is no reference to breeding birds, for example, although two nests were identified in the July 2014 survey and the site is noted as having high potential for nesting birds. Nesting birds are of course covered by Section 1 of the Wildlife and Countryside Act of 1981. The original survey recommends that work on site is carried out outside the normal breeding season. Mount Anvil plan to commence demolition work in July within the normal breeding season. This is being done without a full and current ecological survey.
- I am particularly concerned that tree felling will commence before trees have been properly inspected for bats and other protected species.

A number of mitigation measures are recommended by the Ecology Consultancy in both reports dated 2014 - please would you confirm that these mitigation measures are being implemented particularly with regard to tree preservation on the boundaries of the property, hoardings and lighting.

We would be grateful if you would raise these issues with Mount Anvil prior to agreeing any method statement. As currently submitted, the Method Statement fails to meet Condition 33 and should be rejected.

Penny Davis

REDINGTON FROGNAL

NEIGHBOURHOOD FORUM