

Our ref: KN0087/16  
Your ref: 19/01854/OUT

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Chris Gomm  
Bath & North East Somerset Council  
Planning Services  
Lewis House  
Manvers Street  
Bath  
BA1 1JG

Dear Chris,

**Hartwells Garage, Newbridge Road, Bath (ref. 19/01854/OUT)**

**Response to outstanding consultee comments**

I write to respond to the two outstanding points flowing from the last meeting at your offices, namely the landscaping/biodiversity comments and the query as to whether bats were present within certain identified trees, and to respond to the outstanding query on the submitted Energy Strategy.

Apologies for the time it has taken to get back to you, however it was necessary to go and undertake the necessary bat surveys.

Bats

The Council's Ecologist has previously commented that *"Two ash trees in the south west corner are assessed as having moderate Bat Roosting Potential. If these trees are likely to be affected by the development proposals (either because they need to be removed or because of the introduction of light spill), then further surveys will be needed in order to establish whether bats are using them for roosting. The Arboricultural Impact Assessment (Tree Research, 8 March 2019) appears to identify one of the Ash trees for removal;"*

In response, Windrush Ecology undertook bat surveys of the trees in question on 31 July 2019. Their letter is attached, and their findings can be summarised as follows:

- The two ash trees were noted as being dead on 31st July 2019.
- Dense scrub covering the base of the trees is likely to prevent any bat access to features of the bases of these trees
- No bats or evidence of bats were found during the daytime inspection of the trees
- No bats were seen to emerge from any of the trees during the dusk emergence watch
- Levels of bat activity were considered to be low, with only five passes by common pipistrelle *Pipistrellus pipistrellus* bats during the survey



The supplementary report concludes:

*“In conclusion, roosting bats are considered to be absent from these three trees at Newbridge Road, Bath, including the dead ash trees that are to be removed. The trees exhibit very few features that bats could use for roosting and have been assessed as having low, or negligible-low potential to offer shelter to bats, in accordance with current guidelines (Collins, 2016). No evidence of bats were found during the detailed survey of these trees, and no bats were seen to emerge from the trees during the dusk emergence watch.*

*No further surveys of the trees are recommended, and removal of the dead ash tree can be undertaken without the need for a Bat Mitigation Licence.”*

### Sustainability

You have asked for confirmation of whether – and if so how – the development complies with 1) Placemaking Plan Policy SCR1 (a reduction in carbon emissions of at least 10% by the provision of renewable energy generation) and 2) Policy CR2 (a 19% overall reduction in regulated CO2 emissions)

The Energy Strategy prepared by Hoare Lea demonstrates that, overall, a 22.5% reduction in CO<sub>2</sub> emissions is achieved (meeting Policy CR2), with 16.1% of that being achieved by Air Source Heat Pumps (meeting Policy SCR1).

Therefore the proposed development would comply with the objectives of these policies.

### Landscaping/Ecology

The Biodiversity Officer has previously queried whether there is scope for more planting to provide a continuous habitat connection across the site.

The consultant team has considered this further, however there is no opportunity to amend the scheme in order to try to fit in additional landscaping along the southern part of the site along the STR:

- The starting position is that the current industrial site is not a connected habitat, with large areas of hardstanding and has been allocated as a development site.
- The proposals already greatly improve on the current situation. However, additional meaningful planting at ground level is not practical or possible without the loss of or a reduction in built footprint, parking, service access, or the cycleway.
- Originally the proposal had a narrower cycle path with wider green borders, but the Highways Officer has made it very clear in ongoing dialogue that a wider (and safer) cycle path should be the priority over increasing the width of the planting either side given the anticipated use.
- There is a balance to be struck between the need to incorporate green infrastructure and planting along the length of the site whilst at the same provide the STR to acceptable standards.
- In addition, the existing sewer easement running across the south of the site severely limits the areas where tree planting can take place.
- With reference to the landscaping plan and the area along the southern edge of the site along the STR, the proposed ‘meadow and nature conservation grass’ would typically provide habitat for invertebrates and birds and would be suitable for verges.
- The ‘proposed formal hedgerow / screen planting’ will ideally function as a screen to provide privacy to some of the rooms backing onto the courtyard. These formal hedgerows could be planted in combination with groups of attractive herbaceous planting that encourages wildlife, as well as informal screen planting.
- To strengthen habitat connections, smaller, light canopied, native trees (selected to provide a food source for wildlife) could be planted within the grass areas South West of the parking and West of the bike storage. Outside the sewer easement, this would amount to approximately 2-3 additional small trees. Planted at a low density, the trees would allow light to reach the ‘meadow and nature conservation grass’ below. Their light canopy and narrow stems would



also help maintain views across the area and support security. Further informal native shrubs could be planted along the southern boundary of this car park.

It is necessary to emphasise that the application is submitted in outline with all matters reserved except for access and layout. Any additional planting as suggested above could be secured via a suitably worded condition.

However, we are talking a small number of trees or a slight variation on the proposals before you. Ultimately a considerable amount of design development has gone into the scheme to date and this includes maximising landscaping and ecological enhancement opportunities. It is not possible to add meaningful habitat connections to the current scheme without loss to the STR, the building footprint, and/or the service area.

### Summary

The attached letter from Windrush Ecology confirms there is no risk of bats being present.

Hoare Lea have confirmed the development will comply with Policies SCR1 and CR2.

No changes to the drawings are proposed.

There may be some limited opportunity for additional planting in the extreme SW corner of the site and it is considered that these details would be secured via condition. At this stage only outline consent is sought, and detailed landscaping proposals including ecological enhancements to the site will be considered at a later stage in any event.

I trust this satisfies the outstanding queries. If you have any questions or require any more information please let me know.

Yours sincerely,



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