

From: [Gill Thompson](#)
To: [DC Consultation](#)
Cc: [Colin Godfrey](#)
Date: 24 July 2020 13:44:59

Dear Colin,

I have read the bat survey report that accompanies this application and note that roosts of three species of bat were recorded with the possibility of losing roosts in the kennels. Case law has shown that where a planning application is likely to have implications for European protected species, explicit consideration must be given to the three tests enshrined in Regulation 53 of the Conservation of Habitats and Species Regulations 2017, either in the Committee Report or, in the case of delegated decisions, in the Planning Officer's own notes. Even though Natural England will assess the licence application, as the competent Authority the National Park Authority must evaluate the three tests to determine if such a licence is likely to be suitable before granting planning permission.

The 3 tests are:

- The proposal must be required for imperative reasons of overriding public interest or for public health and safety
- There must be no satisfactory alternative to the proposal
- The proposal will not be detrimental to the maintenance of the favourable conservation status of the species in its natural range.

The first two tests are planning related and if the proposals are in line with the local plan they are usually seen to be met. The third of these tests is examined in terms of the mitigation proposals submitted by the applicant. After looking at the documents provided, my advice for this application is as follows:

The work to the cottage can be carried out with a method statement rather than a licence, no bats were detected in the bothy so the licence refers to the bat roosts in the kennels only. The mitigation and compensation listed in the report includes erection of bats boxes, construction of bat crevices in the renovated buildings, timing restrictions for some work and working methodologies for the alterations to the cottage. Natural England standing advice states that the type and function of replacement roosts should perform the same function as those which they replace. In this instance, I think that the 6 bat boxes in the adjacent trees suggested should be sufficient to ensure suitable boxes are available prior to work commencing as low numbers of bats were recorded. The species recorded will use bat boxes and Brant's bats are associated with trees as well as buildings. The provision of new crevices in the renovated buildings should provide access after the alterations. The methodology and timing suggested for the works seems acceptable to prevent physical harm, including avoidance of the hibernation period for certain works such as demolition of stonework, removal of roofs and stones. The locations of the bat crevices and the bat boxes are shown on the plans in the Design and Access Statement and on the roof and floor plans for each building.

In summary, it is my opinion that the current mitigation suggested is sufficient and I do not object to the application. The roosts are described as being important at the County level because of the presence of the Brant's bat, but if the mitigation is put in place and work carried out in line with the bat report it is likely to be successful given the other details provided. The third test will be met as the proposals are unlikely to detrimentally affect the conservation status

of the bat species present on site; the numbers are low and below 1% of the population.

In addition to bats the other species of interest found using the buildings were swallows and house martins. The provision of house martin nest cups under the eaves is welcomed as is the removal of any vegetation outside the bird nesting season. This should also be made a condition to ensure no loss of biodiversity and possibly a net gain.

If you have any further queries please get in touch,

Yours sincerely,
Gill Thompson

From: DC Consultation
Sent: 28 June 2020 20:29
To: Gill Thompson
Subject: Planning Application Consultation 20NP0043 Keepers Cottage, High Green, Tarsset, Otterburn, Northumberland, NE48 1RP

Please see the attached consultation regarding a planning application which has been received by Northumberland National Park Authority. Full details can be viewed at <http://nnpa.planning-register.co.uk/plaPlanningAppDisplay.aspx?AppNo=20NP0043>

DC Consultation, Development Control Consultation

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Gill Thompson, Ecologist

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