

From: [Gill Thompson](#)
To: [DC Consultation](#)
Cc: [Colin Godfrey](#)
Subject: RE: Planning Application Consultation 20NP0068 Dunshiel Farm, Dunshield Drive, Elsdon, Northumberland, NE19 1AQ
Date: 19 January 2021 15:29:56

Dear Colin,

I have had a look at the updated bat survey report (dated 20/11/2020) provided with this application and note that common pipistrelles were identified during the surveys in 2020 using up to 5 summer day roost locations, which could be lost or altered as a result of the application. In Dec 2020 the NNPA has been notified by the bat consultant that work has commenced/continued on the property and offences have occurred (work currently stopped). Taking into account this recent communication I have continued to assess the application based on the existing report and mitigation shown on the plans submitted.

When 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. It is proposed that the work will be covered under a Natural England Mitigation Licence. Even though Natural England oversee these licences, 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 and considering the changed circumstances my advice for this application is as follows:

The mitigation and compensation listed in the report includes erection of a general purpose bat box on the edge of woodland on site prior to work commencing. The locations of 3 roosts are to be retained in the renovated building and a bat tube incorporated into the wall to replace a lost location. Two bat slates are to be integrated into the roof to provide additional roost locations. Non-bitumen felt should be used. 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 provision suggested should be sufficient. The species recorded will use bat boxes and this is suitable for smaller roosts. Provision will be available in the renovated building to replace/maintain those locations bats were using before, and including additional provision in the roof.

I note that it has been reported that non-bitumen breathable membrane has been used in the recent works although the bat report advised against this. It is likely to be removed imminently

using a 'Reasonable Avoidance Method', which I would agree is a good course of action and would not have to wait until a licence is issued.

In summary, it is my opinion that despite the situation where roosts have already been affected, the mitigation suggested would be sufficient and can still be implemented to provide roosts in the coming season. The numbers of bats likely to be impacted on are low, important only at the local level. If the mitigation and working methodology (given in Appendix 1 of the report and shown on plan 02/20) including supervision by an ecologist, is conditioned from now on it is likely to be the best outcome for bats on site given the situation. The third test will be met as the proposals are unlikely to detrimentally affect the conservation status of common pipistrelle present on site.

In addition birds were using the building and the drawings show additional bird boxes on the plans. These should also be conditioned and disturbance during the bird breeding season should also be avoided.

If you wish to discuss further or you receive anything else from the bat consultant or Natural England, please get in touch.

Yours sincerely,
Gill Thompson

From: DC Consultation
Sent: 16 November 2020 13:56
To: Gill Thompson
Subject: Planning Application Consultation 20NP0068 Dunshiel Farm, Dunshiel Drive, Elsdon, Northumberland, NE19 1AQ

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=20NP0068>

DC Consultation, Development Control Consultation

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