

From: [Gill Thompson](#)
To: [DC Consultation](#)
Cc: [Colin Godfrey](#)
Subject: RE: Planning Application Consultation 20NP0088 Longback Cottage, West Kirknewton Farm, Kirknewton, Wooler, Northumberland, NE71 6XF
Date: 08 December 2020 16:50:49

Dear Colin,

I have had a look at the information provided with this application and note that two bat roost locations of two species were identified during the surveys in 2020 and will be lost as a result of the application.

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 Bat Class Licence (low impact). Even though Natural England oversee these class 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 my advice for this application is as follows:

The mitigation and compensation listed in the report includes erection of 5 bat boxes on site prior to work commencing (3 as compensation and 2 as enhancement). Working methodology of pre-work checks, installation of exclusion valves and removal of sensitive features by hand are also described to prevent injury or death to individual animals. 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 these are suitable for smaller roosts. The methodology suggested for the works seems broadly acceptable to prevent physical harm, including checking prior to work commencing, but I would add a condition that destructive work such as removal of slates and walls should not be carried out in the hibernation period when bats can be vulnerable.

In Northumberland low impact class licences can be used for up to three roosts for common pipistrelle, soprano pipistrelle and brown long-eared bats. These proposals will affect two small roosts of common pipistrelle and soprano pipistrelle, therefore it would seem the class licence is appropriate.

In summary, it is my opinion that the current mitigation suggested is sufficient if we add the timing condition. The numbers of bats likely to be impacted on are low, important only at the local level (4 recorded). If the mitigation is conditioned, the boxes are erected 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 bat report mentions the removal of two trees for the application, but assesses them as not likely to support bats.

The site is reasonably close to the Tweed Rivers SAC, but the size of this development is unlikely to affect this or any other protected site in the vicinity. I note the application includes installation of a new package treatment system for sewage, but do not think this will impact on the surrounding habitats or watercourses.

If you have any queries, please get back to me.

Yours sincerely,
Gill Thompson

From: DC Consultation
Sent: 24 November 2020 07:38
To: Gill Thompson
Subject: Planning Application Consultation 20NP0088 Longback Cottage, West Kirknewton Farm, Kirknewton, Wooler, Northumberland, NE71 6XF

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=20NP0088>

DC Consultation, Development Control Consultation

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