

Planning Department
Council Offices
Church Walk
Clitheroe
Lancashire
BB7 2RA

[REDACTED]

28.10.2024

Our Ref: SI/01/OVF

Dear Planning Department

Application 3/2024/0766: Old Vicarage Farm Talbot Bridge Road Bashall Eaves BB7 3DB

Proposed barn conversion

The above planning application has been brought to my attention [REDACTED]

I note that the application is supported by a "Protected Species" survey report (Pennine Ecological 2024) however based on my experience I consider that the barn owl mitigation that is contained within the report is inadequate and not fit for purpose. It also illustrates that the author of the report lacks a full understanding of what is required to successfully mitigate for the loss of a barn owl breeding site.

The barn owl mitigation is unacceptable for the following reasons:-

- The mitigation proposed is in the converted building, however from the architects drawings I do not see anywhere that a dedicated void can be allocated to a barn owls as the ceiling is vaulted and velux windows incorporated
- Even if this is addressed barn owls can become quite noisy and if homeowners are less than tolerant then at some point in the future the birds could be legally excluded once nesting has been completed
- Planning conditions are unlikely to protect barn owl from being excluded once nesting has been completed
- The mitigation fails to provide opportunities for BO whilst the existing nest is lost
- If barn owl lose continuity of a site then it is unlikely they will return to a site even if mitigation is provided and potentially have a knock on effect whereby a breeding pair is lost at the site and in the wider locality
- A suitable stand-alone nest site for barn owls is likely to be the most productive mitigation at this site to maintain the breeding pair and should be in place and fit for purpose for two months before the existing nest is lost, which needs to be outside of the breeding season

In context with the bat related section I would add:-

- The dusk survey results fails to include details & experience of surveyors who undertook the dusk surveys; this is not in accordance with CIEEM report writing guidelines (2017) of which the author of the report is a member
- At 4.24 mitigation is by way of bat slates, which is acceptable but the mitigation fails to recommend 1F roofing felt as opposed to a breathable product
- Further on mention is made of ridge tile access "where appropriate" with 1F felt but ridge tile access is not actually included in the mitigation drawings and the terminology "where appropriate" is vague, again in contradiction to CIEEM report writing guidelines
- The hibernation survey – static detector results merely mentions bat contacts but does not provide any details about times of recording for example which would provide information of when the bats were actually there in context with say sunset & sunrise so in essence the results are meaningless, no mention is made of how the calls were identified and no effort has been made to at least differentiate Myotis bats to a reasonable degree.

