

20.2.2024

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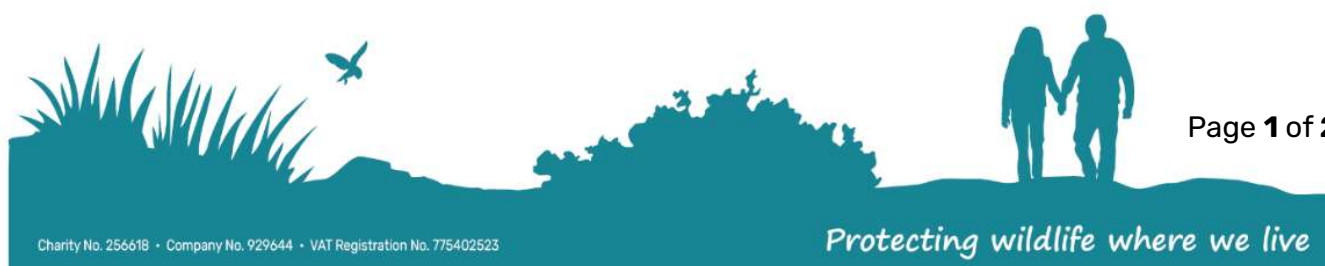
Dear Gillian,

Re: Planning Application W/23/02112/OUT Orchard Farm, Defford Road, Persnore

Thank you for sending us the additional details for this application. We note the contents of the various associated documents and in particular the findings and recommendations set out in the Bat Addendum Report 1 by Aspect Ecology (ref: 6596 Eco Addend dv2 /JW/MRD).

This document is helpful but makes clear that bat survey work is still ongoing. While we note that mitigation that might be suitable for hibernating bats is proposed, it is still important to base your decision on all up-to-date and relevant evidence. Accordingly, and in line with comments set out in paragraph 8 of our previous response (dated 22.11.2023), we continue to believe that you should wait for the remaining bat survey work to be completed before determining the application. This is especially important here because the updated bat survey makes clear that the site is of at least county importance for its bat assemblage, that bat use of the site is more widespread than originally understood and that a range of rarer and light-intolerant species are present.

In this context, it is important to recognise that dark corridors (including ones protected from domestic lighting as well as street lights etc.) will be essential in maintaining the value of the site for bats. This requirement is commented on in the Bat Addendum Report but we cannot find cross-references to site plans setting out how this would be achieved. While this application is in outline only, any significant changes to accommodate the required dark corridors may have an impact on layout of roads, associated development parcels, landform changes etc. and so may have knock-on impacts on Biodiversity Net Gain calculations and other ecological issues. As we set out in paragraph 7 of our previous response, we believe that the ramifications of any changes should be properly understood at this stage rather than being left to later reserved matters applications.



Beyond these points we do not have additional comments to make at this time and we refer you to our previous submission for more detailed consideration of other elements of the application. In the meantime, I hope that these comments are of use to you. Please don't hesitate to contact us again if we can be of further assistance.

Best Wishes,

A handwritten signature in black ink, appearing to read 'Steven Bloomfield', written in a cursive style.

Steven Bloomfield

Senior Conservation Officer - Planning