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Dear Archie

WBC Planning Application 251650 – Cherrylands, New Mill Road

This letter has been prepared following further discussion between the architect and applicant regarding the proposed location of the replacement bat barn. The letter also reflects recent correspondence I have had with Tina Cuss from the Council.

The applicant has confirmed a strong preference to retain the bat barn along the eastern boundary, as shown on the latest site plan. This document provides a rationale for this chosen position, while acknowledging the concerns previously raised by the Council's Ecology Officer and demonstrating how these can be adequately addressed through design, mitigation and licensing safeguards. I have also discussed lighting and characterisation of the bat roost in terms of hibernation potential.

Bat barn location (eastern boundary)

From an ecological perspective, the eastern boundary provides several advantages that support the delivery of effective and proportionate mitigation for Brown long-eared bats. In particular, the structure sits directly adjacent to open countryside to the east, which provides strong flight connectivity, good commuting routes, and access to open foraging habitat. This transitional edge between retained vegetation and surrounding open fields is characteristic of habitat regularly used by Brown long-eared bats, which typically forage along wooded edges rather than deep within dense woodland.

The proposed location also positions the roost away from the main domestic activity zones, reducing disturbance and maintaining a functional ecological buffer. Boundary vegetation provides natural screening, while still maintaining the open frontage required for unimpeded bat access.

Updated arboricultural information supplied by GHA Trees confirms that the proposed bat barn does not encroach into any tree root protection areas, and that its installation can be achieved without any tree removal, crown lifting, or ground disturbance within RPAs. This is a material change since earlier discussions, and it satisfactorily addresses the previously identified risk of habitat loss associated with woodland-edge features.

The revised arboricultural position reduces the ecological risk significantly and supports the feasibility of retaining the bat barn in the proposed location.

Lighting Strategy and Light Levels for Bats

A sympathetic lighting strategy will be implemented to ensure that illumination levels around the bat barn and its approach remain suitable for light-averse bat species. Light spill will be minimised through:

- Replacing existing powerful spotlights with low-intensity, warm-spectrum, directional downlights;
- Ensuring no lighting is directed toward bat access points or flight paths;
- Maintaining a dark corridor along the eastern boundary to facilitate commuting.

This approach aligns with current BCT lighting guidance and ensures that installation of the bat barn will not create lighting impacts that could compromise roost functionality

Hibernation Potential and Likelihood Assessment

Concerns have been raised regarding whether the existing roost may also support hibernation. Based on a review of the building construction, hibernation use is considered unlikely, for the following reasons:

- The loft is constructed from uniform, planed timber offering limited cracks, fissures or thermal stability;
- The roofing felt and timber are in good condition, without the complex layering or micro-cavities typically used for hibernation;
- Internal conditions appear relatively dry and exposed, lacking the stable temperature and humidity gradients associated with suitable hibernation niches.

While the possibility cannot be entirely excluded, the structural evidence strongly suggests that the existing roost does not function as a significant hibernation site.

To provide further assurance, hibernation monitoring can be undertaken this coming winter. This will help confirm the absence of hibernation use and ensure that any EPS licence application is fully supported with appropriate evidence.

This issue, however, should not hold up planning determination, as:

- Any need to account for hibernation would relate only to the timing of works,

- It would not require changes to the design, footprint, location or materials of the proposed bat barn,
- Therefore, it is not a material planning matter and does not affect the acceptability of the current layout.

Mitigation for hibernation use (if later identified) is entirely compatible with the proposed scheme and can be addressed at the licensing stage without further planning amendments.

Natural England's Policy 4 explicitly allows for flexibility in survey effort where impacts are low, mitigation can be secured, or where outstanding uncertainties can be addressed through post-consent licensing safeguards. In such circumstances, NE may accept reduced or seasonally constrained survey data.

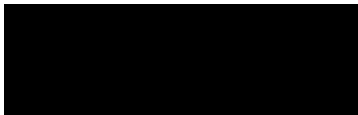
Given that Natural England is the statutory licensing authority for protected species, it follows that local planning authorities should not adopt a stricter approach than that taken by NE. Where NE accepts a pragmatic, proportionate approach under Policy 4, it is reasonable for the LPA to do the same. The proposed strategy—supported by further winter monitoring—fully aligns with NE's expectations of proportionality and risk-based assessment.

Conclusion

Within the constraints set by the applicant, the eastern boundary location represents a viable and ecologically defensible position for the replacement bat barn.

The proposed mitigation remains fully capable of delivering suitable roosting opportunities for Brown long-eared bats and of supporting a future EPS licence. On this basis, there is no ecological reason to oppose the bat barn in its proposed location, and no need for this matter to delay the determination of the planning application.

Yours sincerely



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Managing Director