

**SOUTH NORTHAMPTONSHIRE COUNCIL  
MEMORANDUM**

To: Maria Philpott – Principal Planning Officer  
(Development Management)

From: Paul Evans – Ecology Officer  
(Enforcement – Development Management)

Date: 3<sup>rd</sup> October 2019

**Ref: S/2019/1728/MAF at Towcester Conservative Club 152/154 Watling Street East Towcester  
NN12 6DB – Ecology Comments**

Having reviewed the submitted details for this application I have the following comments.

The application is not accompanied by an appropriate ecology report assessing the impacts of the proposed development on protected species and habitats, this is required prior to the determination of this application to ensure the impacts of the proposed development on protected species are adequately assessed and taken into account as part of the planning decision making process. This is in line with government guidance ODPM Circular 06/2005 Biodiversity and Geological Conservation – Statutory Obligations and their impact within the planning system (paragraph 99), NPPF and Natural England standing advice in respect to protected species <https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications>.

Buildings of this age, which are proposed for conversion, have features that have potential for protected species (bats and nesting/breeding birds) to be present and is situated close to habitats including woodland, watercourses, parkland and hedgerows in the countryside to the northeast of Towcester that maybe utilised by these species for foraging and commuting. Bat roosts maybe present for example in gaps between missing/loose roof tiles and/or in the loft space of the buildings. Birds may be nesting within the buildings, for example under the eaves.

A Preliminary Ecological Assessment (PEA) should be undertaken of the site and should include an assessment for the presence of the following species bats and nesting/breeding birds, carrying out any surveys as recommended by the consulting ecologist to confirm presence/absence. The consulting ecologist may recommend further surveys than outlined above based on the findings of the PEA.

Survey should be undertaken for bats following best practice Bat Surveys for Professional Ecologist: Good Practice Guidelines (3<sup>rd</sup> Edition) and Natural England standing advice. With a preliminary roost assessment carried out in the first instance with any further bat surveys carried out as recommended by the ecologist within this initial assessment.

As part of the desktop study element of the survey report, data search requests should be submitted to the [Northamptonshire Biological Records Centre \(NBRC\)](#) and any relevant species recording groups who do not have data exchange agreements with the local records centre.

The report should detail any mitigation that maybe required based on the findings of the surveys and previous survey data/records available for the site and protected species licence applications if required. In line with NPPF it should also detail appropriate enhancements for biodiversity.

In summary, prior to the determination of this application a protected species survey and report covering bats and birds is required to understand the current status of protected species within the development site. The submitted survey report should include an assessment of the impacts on protected species, appropriate mitigation, compensation, whether a licence application will be required and enhancements based on the findings of the surveys and past data available, in line with best practice, policy and government guidance.