

Our Ref: 784-B072252

Your Ref: 4/25/2169/0F1

FAO: Christie Burns

11<sup>th</sup> August 2025

Dear Christie

### **784-B072252 PETERSBURGH FARM**

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The project is located on agricultural land lying off Nursery Road, approximately 0.8 km south of Beckermeth village, Cumbria. The Proposed Development is for the conversion of five disused stone barns into two different homes - one home will contain two bedrooms and the other will contain four bedrooms. Planning application reference is 04/25/2169/0F1.

The applicant has provided a full application including the following documents:

- Supporting Statement
- Site Location Plan & Site Block Plan
- Initial Floor Plans
- Proposed Elevations and Sections
- Bat, Barn Owl & Nesting Bird Survey
- Bat Activity Survey Report

Following an initial response and request for further information via email on 17/06/2025, Natural Ecology provided a response as well as an updated version of the Bat Activity Report (July, 2025).

With consideration of the above listed documents and Natural Ecology's response letter and revised bat report, Tetra Tech Limited, on behalf of Cumberland Council, provide the following comments:

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## **Designated Sites**

The proposed development site does not lie within any international / European designated sites and the nearest international / European site is Drigg Coast Special Area of Conservation at 6.1 km distance.

The nearest National statutory designated site is approximately 540 m from the site (Low Church Moss Site of Special Scientific Interest (SSSI)).

This proposed development project does not lie within any Local Nature Reserves and there are no Local Nature Reserves within 5 km of this proposed development project.

## **Biodiversity Net Gain**

This application does not meet the requirements for de minimis Biodiversity Net Gain (BNG) exemption - using aerial imagery it appears that the proposed plan exceeds the 25 square metres of onsite habitat that has biodiversity value greater than zero, and linear habitats exceeding 5m in length are suspected to be impacted by the proposed barn conversion, as per the Environment Act's BNG requirements.

A BNG assessment is required for the works. The site may qualify for the small sites metric as two dwellings are proposed, no protected sites or habitats are present, and the site is less than 0.5ha.

## **Protected and Notable Species**

### **Bats and Birds**

Daytime bat and bird surveys were carried out in October 2023 by Evirotech who determined that all six buildings had suitability for barn owls and other nesting birds. Evidence of roosting bats (droppings) were identified in Building 1 and 3. A barn owl was roosting in Building 4 and Building 5 also contained a barn owl nesting box. Further surveys were recommended as the validity of this report has passed.

The bat report supplied to us via the planning portal, titled "Bat Activity Report: Petersburgh Farm Beckernet Cumbria" written by Natural Ecology in July 2024 and updated in July 2025 found that Buildings 1 and 3 do have suitability for bat species. Bat activity surveys were subsequently carried out by Natural Ecology during May, June and July of 2024 in accordance with the 2016 Bat Conservation Trust Guidance (which is now superseded by the 2023 4th Edition, however Night Vision Aids were used which was a key iteration in the guidance).

Buildings 3 and 4 both had low suitability for roosting bats and had one emergence survey undertaken, during which no roosting bats were identified.

Barn owls were confirmed to be nesting in Building 5 but not in Building 4.

### **Other Protected Species**

A small area of grassland habitat will be lost to facilitate the proposed package treatment plan. Although there are waterbodies in the wider area, it is considered that impacts on great crested

newts and common amphibians and reptiles are unlikely. As a precaution, works to the grassland must be carried out using Precautionary Working Methods as detailed below, in combination with those detailed in the 2023 Bat, Barn Owl and Nesting Bird report.

### ***Recommended Conditions:***

#### Precautionary Working Methods

- A toolbox talk regarding all protected species which could be using the site (including bats and barn owls) must be given to all contractors prior to works commencing
- Works impacting potential bird nesting habitat (buildings, scrub) should avoid the nesting season (March- September inclusive) where possible. If this is not possible, a nesting bird check must be carried out on all suitable nesting features to be impacted (including buildings) immediately before work commences (within 24 hours) by a suitably qualified ecologist. If any nests are found to be in current use, work must cease until all chicks have fledged and parent birds have abandoned the nest.
- A pre-commencement check of Building 4 and 5 is required in 2025 prior to works to determine if the buildings are used by nesting barn owls.
- Pre-commencement checks of PRFs are to be undertaken by a licensed bat ecologist and removal of PRFs to be supervised by the bat ecologist.
- If any bats are identified during pre-commencement checks or works, all works must cease and the licenced bat ecologist consulted immediately for next steps and licensing options.
- Any works which break ground of suitable amphibian &/or reptile habitat must avoid the hibernation period to avoid disturbance of hibernating herpetofauna.
- Pre-commencement fingertip searches of suitable amphibian &/or reptile habitat by a suitably experienced ecologist.
- Directional staged strimming of vegetation as appropriate to allow any amphibians .
- Any excavations on site must be covered overnight or a means of escape provided for any wildlife which may become trapped within the excavation. The excavations, if left open, will need to be inspected daily prior to works commencing.
- Mitigation measures to be detailed within a Construction Ecology Management Plan (CEcMP or equivalent) to prevent impacts from pollution (noise, water, air, light, visual impact) to designated sites.
- If any equipment or materials are to be stored on site overnight, all possible entrances must be blocked and checked for wildlife the following morning prior to work commencing. If present, the Ecologist should be contacted for advice.

In addition to the Precautionary Working Methods, the following recommendations set out in Section 6 of the 2025 Bat Activity Report are to be implemented during the works as a condition of planning:

- As there have been bats previously present on site, although roosting unconfirmed, (due to droppings noted during the preliminary roost assessment), breathable roofing membranes (BRM's) should not be used due to an entrapment risk to bats. Type 1F hessian reinforced bitumen felt should be used within the roof.
- External lighting should be kept to a minimum and, where necessary, should be low wattage and should include measures to reduce reflective rebound into the surrounding sky.
- Site lighting will be kept to a minimum during construction and operational phases. If lighting is necessary, there are a number of ways to minimise the effect of lighting on bats. Information can be taken from the Institution of Lighting Professionals and Bat Conservation Trust's Guidance Note 08/18 Bats and artificial lighting in the UK (2018). If further clarification is required, the ecologist should be consulted.
- If the works is delayed by more than one year (into the summer of 2025 or late) then update surveys of all buildings is likely to be required.
- The loss of bat roosting habitat must be compensated onsite by the installation of 3x general purpose bat boxes or alternatively incorporating at least 3 gaps of 20mm into the new build ridge tiles, beneath roofing tiles or soffits.
- The barn owl nesting box in Building 5 must be moved to a suitable location, after barn owls have finished nesting in it for the season and chicks have fledged, to be confirmed and evidenced by an Ecologist.
- No work should be carried out on these buildings when they are actively used by nesting birds.

Yours sincerely

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**Associate Ecologist**

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For and on behalf of Tetra Tech  
Limited

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