
From: Johnston, Christopher
Sent: 04 June 2021 09:05
To: Planning Comments (SMDC)
Subject: FW: SMD/2021/0292 Willowshaw Farm- alterations and extension

From: Kate Dewey <k.dewey@staffs-wildlife.org.uk>
Sent: 03 June 2021 12:44
To: Johnston, Christopher <>
Cc: AbsoluteEcology@hotmail.co.uk; Alex Fitzroy <a.fitzroy@staffs-wildlife.org.uk>
Subject: SMD/2021/0292 Willowshaw Farm- alterations and extension

Ref number SMD/2021/0292

Application Location Willowshaw Farm, Cloudside, Congleton, CW12 3QQ

Application description Alterations and two storey rear extension

Staffordshire Wildlife Trust has been asked to review the above application as part of a service level agreement with Staffordshire Moorlands District Council to provide ecology advice regarding planning and development management functions.

SUMMARY – Holding objection - further information required. Potential impacts to common pipistrelle and brown long-eared bat roosts, which are currently unclear.

Requirements:

1. An ecological data search for protected and priority species in the area
2. Further information on the current farm house roof void layouts, existing and proposed, locations of bat droppings, and assessment of impacts to bat roosts in the roof and wall cavity. Clarification on the number of bats found, and whether a licence will be required.
3. Assessment of impacts and mitigation against the 3 tests under the Habitat Regulations
4. Potentially further bat survey dependant on impacts
5. A detailed avoidance/mitigation/ compensation strategy, detailing any retention of existing roosts and access, creation of new roosts, and any other enhancements and their locations, to be incorporated within the plans.
6. Method statement for protection of amphibians during construction- condition

Documents reviewed:

- Bat Activity Survey (September 2020, Absolute Ecology)
- 2020-2545-02 EXISTING CONDITIONS - FARMHOUSE AND ATTACHED BARN FLOOR PLANS
- 2020-2545-03 EXISTING CONDITIONS - FARMHOUSE AND ATTACHED BARN ELEVATIONS
- 2020-2545-05 EXISTING CONDITIONS - SITE PLAN
- 2020-2545-07B PLANNING PROPOSAL - FARMHOUSE EXTENSION FLOOR PLANS
- 2020-2545-08B PLANNING PROPOSAL - FARMHOUSE EXTENSION ELEVATIONS
- Application Form

DESIGNATED WILDLIFE SITES

Local Wildlife Sites

Cloud Side BAS lies opposite the site, Wren Clough SBI and ancient woodland are located downstream of the proposal– neither appear affected.

HABITATS

Biodiversity Net Gain

In its current form the development will not meet biodiversity net gain targets. Several bat specific enhancements could be added to the farm house to provide additional habitat.

SPECIES

Bats

Survey methods-

No ecological data search for bats has been included within the report. This is required to give the survey results context within the wider landscape and to check for potential off-site impacts, such as impacts to local bat populations.

Surveys carried out- *1 – dusk emergence 22/08/2020, 2 – dusk emergence 31/08/2020, 3 – dawn re-entry 16/09/2020*

The environmental conditions for all 3 surveys were optimal. Surveys 1 and 2 were in late August and only nine days apart, contrary to the minimum recommended period of 14 days. This constitutes a survey limitation but no justification is given. Surveys late in the season (August / September) make it more likely that summer maternity roosts are missed (BCT Good Practice Guidelines 2016). Given the number of bat droppings in the roof, a maternity roost being present earlier in the year is possible, which would be of greater significance and require more mitigation. More survey information may be needed depending on the impacts proposed.

The report lists 3 surveyors, but the surveyor location map shows 4. It is not clear whether the surveyors would have been able to cover the rear of the farmhouse to see both sides of the rear elevation.

Results-

Approx 300 bat droppings were found in the farmhouse roof. No diagram of the roof is provided so it is not clear whether the two roof voids are joined and where the droppings were- this is required.

Activity surveys revealed 1 pipistrelle and 1 Brown long eared bat roosting in ridge tiles in the main roof, and a roost of 2 or 3 x Common Pipistrelle located in a gap in a brick wall on the south-west elevation. Clarification is needed on the number of bats found as there are conflicting statements within the report.

Impacts and Mitigation-

The Bat Activity Report states: “Retention of roosts – as all buildings are to be converted into residential accommodation, it will not be possible to retain roosts.” and ‘As the site is still within the design phase, there is currently no proposal plan.’ Thus it is assumed that actual impacts and alternatives to roost destruction have not been considered. Retaining bat roosts in-situ, followed by modification only if necessary, is preferable to compensating for the destruction of a roost.

It is not clear whether the farmhouse roof void will be impacted, whether the proposed new extension will impact the existing roof, if a loft space can be included, or whether the pipistrelle roost on the south west wall elevation

would be impacted at all. Impacts have not been defined in the report or plans. It may be possible to avoid the need for a bat licence at all, if the two roosting areas can be avoided.

As it currently stands, it is not possible to assess the proposals against the 3 tests within the Habitat Regulations 2010, particularly whether there is an overriding public interest, and whether there is no satisfactory alternative.

After the additional information has been reviewed, the following will be needed as a minimum:

- A method statement will be required to avoid any injury to bats. This is to include a tool-box talk prior to works commencing, supervision of any roof, loft, or first floor works by a licensed ecologist, and suitable timing of works to avoid disturbance to bats as recommended in the Bat Activity Report by Absolute Ecology. A full schedule of works with relation to bats should be created so that all contractors are aware.
- Amendments to the plans are also required to specify the use of bitumen felt. No breathable membranes are to be used due to the risk of bat death via entanglement.
- New bat features within the extension to provide net gain

Once impacts are clarified potentially also:

- Further surveys to rule out maternity roost
- A EPS licence from Natural England
- A detailed mitigation and enhancement strategy, including features (including retention of existing roosts and access points where at all possible) and their location shown within updated plans.

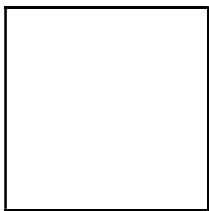
Great Crested Newts, Amphibians

There are a number of ponds within 250m and so potential for GCN to be present in the area. Given the small area of the proposals impacts are less likely, but a working method statement to protect amphibians during construction should be secured via condition should permission be granted.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

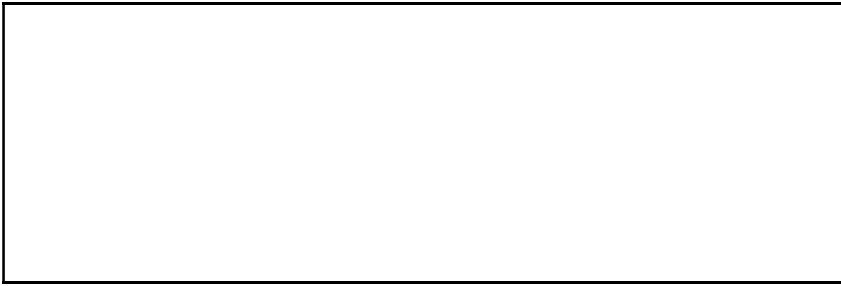


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