
From:
Sent: 29 October 2021 13:36
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Subject: Simfield Farm SMD/2021/0632
Attachments: Simfield Farm structures needing bat survey.pdf

Ref number SMD/2021/0632

Application Location Simfield Farm, Greens Lane, Werrington, Staffordshire, ST2 9DT

Application description Conversion and alteration of agricultural building to form 1no. dwellinghouse

Site size hectares 0.1406

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 – insufficient information to determine ecological impacts.

Required prior to determination:

1. Outline surface and foul drainage scheme. Consult Environment Agency and SCC Flood Team if necessary.
2. Further habitat/ species survey of any areas to be impacted by drainage works.
3. Bat and bird assessment of two structures proposed for demolition omitted from the submitted Bat and Bird Survey.

Secure via condition should approval be granted in future:

1. Detailed drainage scheme
2. Updated landscaping plan detailing biodiversity enhancements.
3. Construction Environmental Management Plan (CEMP), detailing pollution prevention of the watercourse.
4. Bat mitigation as required following further surveys, including as a minimum a method statement (with supervised soft demolition) and integrated bat box enhancement.
5. Timing constraints and bird box enhancements for nesting birds.
6. Any further species mitigation required for overall scheme

Documents reviewed:

- 1740-05 PLANS and ELEVATIONS as EXISTING
- 1740-06 PLANS and ELEVATIONS as PROPOSED
- Application Form
- Bat and Bird Survey (23rd August 2021) Chris Smith
- Planning Statement
- Structural Survey

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

There are no designated wildlife sites nearby or impacted.

There are semi-natural habitats surrounding the site, including marshy grassland, hedgerows and a small watercourse/ ditch, which have potential to be priority habitats. The site is connected to Causeley Brook

and other habitats downstream by the drainage ditch situated immediately adjacent to the buildings. Impacts need to be considered carefully, particularly in regards to drainage, and construction works.

HABITATS

Drainage and Flooding

Surface drainage- The application form states a soakaway is proposed. However, no surface water drainage plan has been submitted so the location and potential are unknown. This may involve excavation outside of the application boundary and impacts to other habitats/ species. The Environment Agency flood maps show that the site is liable to surface water flooding, therefore soakaways may not be suitable. Some level changes, balancing and sustainable drainage may be required. EA and SCC Flood Team may need to be consulted.

Foul drainage- No foul drainage plans have been submitted, or proposed. There is no foul drainage at present and limited space within the red line boundary, so likely to impact outside of the red line boundary. If a septic tank or package treatment plant is required, discharge to the existing water environment needs consideration.

A drainage ditch that discharges into the nearby brook is located immediately adjacent to the existing buildings. What appears to be marshy grassland is associated with the waterway just to the north of the site. Therefore, due to potential surface water flooding issues and potential habitat impacts, drainage proposals need to be considered prior to determination.

Drainage plan required prior to determination.

Biodiversity Net Gain

Policy NE1 in the Staffordshire Moorlands Local Plan Adopted September 2020, expects that 'all development where possible seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development. In circumstances where adverse impacts are demonstrated to be unavoidable, developers will be required to ensure that impacts are appropriately mitigated, with suitable compensation measures towards loss of habitat used only as a last resort where there is no alternative'

The ecology report states that "*The site for the conversion has no value to biodiversity and comprises entirely building and hard standing*". However, this is not accurate, as within the ecology report photos trees and shrubs are clearly present, including a tree that is to be felled as part of the proposals. The areas to be impacted by any drainage infrastructure have also not been assessed.

The proposals could deliver a small net gain via the proposed garden space and bat and bird features, providing replacement trees and biodiversity enhancements can be included. This should be addressed via a suitable landscaping plan.

Landscaping

The proposed plans (drawing ref: 1740-06) show a proposed garden with some additional hedgerow planting, whilst one tree adjacent to the structure is to be felled. To secure a biodiversity net gain the following should be included:

- Hedgerows to consist of locally native species with standard trees.
- Lawn areas to utilise a short flowered lawn mix.
- Any disturbed grass areas should be reseeded with a wildflower meadow seed mix.
- Two trees should be planted to replace the one lost. These could include fruit trees on dwarfing rootstock, or smaller native species such as Rowan, Hazel or Dogwood.
- Planting list and details of any enhancements including bird boxes to be provided within an updated landscaping plan.

Condition required to secure amended landscaping plan to ensure a biodiversity net gain.

Causeley Brook

A drainage ditch that discharges into the nearby brook is located immediately adjacent to the existing buildings. To protect these and downstream habitats, a construction environmental management plan (CEMP) is to be followed. This is to mitigate for pollutants and silting.

Condition required to secure CEMP.

SPECIES

Bats

Survey methods- A preliminary bat roost and bird survey (PRA) was conducted on 5 structures (labelled as the barn, barn 1, barn 2, and two pole barns). However, the survey did not cover the two smaller structures adjacent to the west side of the stone barn. One of these appears to be completely covered in ivy, which increases potential use by bats. These two structures are proposed to be demolished and shown as dotted lines on the 1740-06 PLANS and ELEVATIONS as PROPOSED. Please see the attached images which shows these circled in red.

A Preliminary Roost Assessment for bats and nesting birds is required for these structures.

Additional information required prior to determination.

The PRA was followed by a single dawn activity survey. It appears from page 16 of the report that the brick barn was not covered adequately on the southern and western side during the activity survey, as no surveyor was located on this side of the structure. The vegetation on the southern gable of the stone barn also appears to make it difficult to view. The brick/stone barns appear to have been present since at least 1880 as they appear on old OS maps.

Results- No bat roosts were recorded within any of the structures (Brick barns 1 & 2, barn, and pole barn).

Impacts and Mitigation- Due to the presence of foraging and commuting bats on site, the report recommends a method of working for bats to be in place for the development as a precautionary measure. Due to the limited coverage of the brick barn during the survey (unless this can be proven otherwise), we recommended that the existing roof of the stone barn be subject to a supervised soft demolition as part of the method statement. ***If*** any bats are encountered works must cease immediately and a licence from Natural England obtained to legally continue with the work.

Enhancements – The report recommends an integrated brick bat box to be installed as part of the development. This needs to be detailed within the relevant plans to ensure it is fitted at the appropriate stage.

Condition needed to secure method of working (including supervised soft demolition of stone barn), and integrated brick bat box enhancement.

Birds

Nesting birds were recorded within barn 1 and the barn (as labelled on page 20 of the ecology report). Nesting opportunities are also present within the other buildings.

Due to this, timing constraints are needed. No demolition works should take place during the bird nesting season (March – August, inclusive) or if nesting birds are present outside of this period.

As the building labelled 'the barn' ('Existing Agricultural Building' within drawing ref: 1740-06 Proposed plans) is to be retained, swallow nesting opportunities will be preserved. However, we would like to see a minimum of two bird boxes included within the proposals to compensation for the other buildings. These may be included on any of the buildings, or existing trees if large enough.

Condition required to secure timing constraints and bird boxes.

Other Protected/ Priority Species

Drainage and demolition works may impact other habitats and as part of further surveys, any potential for badgers, water vole, great crested newt etc. should be noted and appropriate mitigation proposed where necessary.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



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