
From:
Sent: 16 December 2021 08:00
To:
Cc:
Subject: Re: Parkfields Farm, Cheadle SMD/2021/0607 & 0608

Dear Arne,

The updated Bat and Bird Survey dated November 2021 now shows details for the proposed bat and bird features which are suitable. However, there still appears to be no mention or photos of the building directly to the north of Barn 2 (as per page 10) that we referred to previously. This structure is labelled as "Existing shed taken down" within the 'Block Plan as Proposed'. If this structure has negligible potential for bats, evidence needs to be provided for the avoidance of doubt.

As per our previous comments, we also still need clarification regarding the survey effort and possible deviation from guidelines.

Drainage details and GCN survey are still outstanding although we understand these are being actioned.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



Planning consultations- please send to

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On Thu, 4 Nov 2021 at 09:16, Kate Dewey <k.dewey@staffs-wildlife.org.uk> wrote:
Ref number SMD/2021/0607 & 0608

Application Location Parkfields Farm, Cherry Lane, Cheadle, Staffordshire, ST10 4QS

Application description Conversion and alteration of former agricultural buildings to form 5 no. dwellinghouses and associated works

Site size hectares 0.49

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 and amendments required.

Due to the requirement of a licence from Natural England, details are required prior to determination as full planning permission is required for the licence application:

1. PRA survey of the structure to the north of barn 2 (not included during previous surveys but to be demolished).
2. Further clarification regarding survey effort of the barns due to deviation from guidelines and/or additional survey effort if required.
3. Updated plans showing bat and bird compensation features.
4. Surface and foul drainage plan, incorporating SuDS where feasible and wildlife friendly features.
5. Great crested newt assessment of nearby pond and any mitigation requirements.

Secure via condition if permission granted in future:

1. Landscaping plan detailing habitat creation, enhancements, and planting lists.
2. Ecological Construction Management Plan (ECMP).

Documents reviewed:

- 0987-01 - A Site Block Plan
- 0987-02 - Ground Floor Plan – As Existing
- 0987-03 - First Floor Plan – As Existing
- 0987-04 - Elevations – As Existing
- 0987-07 Rev D – Block Plan As Proposed
- 0987-08 Rev D – Ground Floor Plan As Proposed
- 0987-09 Rev C – Enlarged Ground Floor Plan
- 0987-10 Rev C – Enlarged Ground Floor Plan
- 0987-11 Rev B – First Floor Plan As Proposed
- 0987-12 Rev E – Elevations As Proposed
- 0987-13 Barn 5 – Ground First Floor Plans and Section
- Application Form
- Bat and Bird Survey (16th August 2021)
- Design and Access Statement

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

The development does not appear to impact on any important sites.

HABITATS

Habitat Survey

The habitats on site were not surveyed in detail, however, as per the ecology report they predominantly consist of buildings, hard-standing, and amenity grassland. Thus, the impacts to habitats (beyond bat roosts) will be negligible, and the inclusion of new habitats will be beneficial.

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 proposal appears likely to result in a net gain providing bat and bird and other habitat enhancements can be included.

We suggest utilising a short flowery lawn mix, climbers, fruit trees, new native hedges on new boundaries, enhance existing hedges with trees/ additional species, re-seed disturbed areas with wildflower meadow mix, and create pond/ wetland for surface and treated water discharges.

Landscaping

A landscaping scheme detailing habitat creation/retention, enhancements (as above), and planting lists **to be secured via condition.**

Drainage

Surface drainage- The application form states a soakaway is proposed. However, no surface water drainage plan has been submitted so the location and potential impacts are unknown. This may involve excavation outside of the application boundary and impacts to other habitats/ species.

We suggest the use of permeable surfaces for parking areas (e.g. grasscrete), water butts, use of landscaping to infiltrate, roadside swales, use existing ditches along hedges, avoid pipes in favour of open features.

Foul drainage– As per the application form, a package treatment plant is proposed. No foul drainage plans have been submitted.

A surface and foul drainage plan is required prior to determination.

SPECIES

Bats

A PRA and two subsequent activity surveys were conducted for the buildings (barn 1, barn 2, barn 3, barn 4, cattle shed 1, and cattle shed 2) during July and August 2020. The first activity survey was conducted by three surveyors and second survey by two surveyors.

The bat surveys found that:

- Brown long-eared (BLE) bats are using the first floor of barn 3 as a "Night roost, feeding perch, and possibly a Day roost".
- Common pipistrelle and brown long-eared bats are using barn 4 as "a place of shelter". There are contradictory statements regarding barn 4 within the summary.
- As per pages 29 and 30, a single common pipistrelle bat emerged from the small store structure located adjacent to the west of 'cattle shed 1'. This is not included within the summary.

The report recommends that a bat method of working is followed, and that the loss of BLE roosts is compensated via a dedicated bat loft with ridge entrances within barn 3.

Survey limitations: No SER record search has been undertaken as part of the desk study, which means records may have been missed from the area.

The structure immediately to the north of Barn 2 does not appear to have been surveyed. This is based on the site map on page 10 of the bat report and that no reference is made to this structure within the text. However, the proposed block plan clearly shows that this structure will be demolished. This building needs to be surveyed to assess bat roost potential and nesting bird presence.

Impacts not assessed (building not surveyed). Further survey effort required prior to determination.

As per pages 12-16 of the of the bat and bird report, the PRA determined that barn 2 has "possible" likelihood of bats roosting behind the ridge board, under ridge tiles and eaves of the building. This means

that although not stated within the report that the structure is of at least low roosting potential. However, it is clear from the surveyor location maps that the western elevation of this structure was not covered during the activity surveys.

The report states that “*The number of surveys undertaken on each building was determined with reference to the Bat Survey Guidelines for properties with low and high roost potential.*”. However, only two surveys were conducted, which is contrary to the recommendations that a minimum of three activity surveys are conducted for high roost potential structures, which we assume applies to barn 3 (at least). In addition to this, it is unclear if enough surveyors were utilised, particularly during the second activity survey which included only two surveyors. No justification is made as to why the guidelines were not followed.

Impacts unclear. Clarification regarding deviation from guidelines or additional survey effort required prior to determination.

The report recommends that a bat loft for brown long-eared bats and ridge tile roosting features are implemented. The proposed bat loft needs to be detailed on updated plans, to show that this is feasible in the development.

Additional compensation is required for common pipistrelles; this should include integrated brick bat boxes as per page 50 of the bat report. A minimum of one per new dwelling will be required (if a suitable aspect is available). Some details are provided within pages 47-51 of the ecology report.

Additional mitigation/compensation may be required pending any further survey effort.

Updated plans showing brown long-eared and common pipistrelle bat compensation features required, prior to determination.

Due to the presence of bat roosts a licence from Natural England will be required to legally undertake the development. Full planning permission is required for the licence application, and consideration must be given to the 3 tests under the Habitat Regulations-

- *the activity must be for a certain purpose - for example, for scientific research or in the case of development, 'preserving public health or public safety or other imperative reasons of overriding public interest, including those of a social or economic nature and beneficial consequences of primary importance for the environment '*
- *there must be no satisfactory alternative that will cause less harm to the species*
- *the activity must not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range.*

We believe the 3 tests can be passed, providing adequate mitigation, compensation, and enhancements can be secured within the proposals.

Great Crested Newts, Amphibians

There is a pond located to the west that falls within 100 m of the development footprint. Therefore, amphibians (including great crested newts) need to be considered due to the ground works that will take place and the connectivity of the pond to the site. An HSI survey of the pond is required and an assessment to determine whether a licence would be needed if GCN were present. If a licence is required, a presence/ absence survey for GCN will be needed.

GCN assessment required prior to determination.

Birds

The bat and bird survey found that birds were nesting within the following buildings: barn 2, barn 3, and barn 4. The survey map on page 44 shows a total of 9 nests within the buildings.

Timing constraints or a nesting bird check prior to works commencing will be required.

Compensation nesting features are required for those lost. These should consist of like-for-like compensation for recorded species on site. Consult site ecologist for recommendations. These may be included within retained structures elsewhere on site, however, we would like to see some included on or around the new dwellings.

Bird compensation and enhancements to be detailed on updated plans prior to determination.

Badgers

Reasonable Avoidance Measures for mammals (including badgers) should be followed: any excavations to be covered over night or means of escape provided.

Ecological Construction Management Plan (ECMP)

An Ecological Construction Management Plan (ECMP) is required to be made available to and followed by all contractors. This is to include RAMs for mammals (including badgers) regarding excavations, RAMs for amphibians (including great crested newts), method statement for bats, and birds (e.g. timing constraints or nesting bird check prior to works commencing). And others if required.

ECMP to be secured via condition.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



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Planning consultations- please send to planning@staffs-wildlife.org.uk

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