
From: Planning For Nature
Sent: 13 October 2022 17:11
To: Haywood, Ben; Planning Comments (SMDC)
Cc:
Subject: SMD/2021/0775 The Boathouse

Categories:

SMD/2021/0775

The Boathouse, Lakeside Road, Rudyard, Staffordshire, ST13 8RP

Proposed change of use to form single dwelling

0.19 hectares

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

Required prior to determination:

1. Surface and foul drainage scheme
2. Confirmation that no trees with bat potential will be felled
3. Confirm whether a satisfactory alternative exists to retain the brown-long-eared bat roost in situ, and that there is an overriding public need for bat roost impacts.

Secure via condition should approval be granted:

4. Method statement for eradication of Japanese knotweed from the site
5. Landscaping plan that demonstrates a net biodiversity gain
6. Bat-sensitive lighting plan
7. Recommendations for species within the Preliminary Ecological Appraisal May 2022 and Bat Activity survey August 2022

Documents reviewed:

Preliminary Ecological Appraisal May 2022 Absolute Ecology

Bat Activity Survey August 2022 Absolute Ecology

2020-2578-02B PLANNING PROPOSAL - FLOOR PLANS AND ELEVATIONS dated 24/08/2022

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'

It is not clear whether the proposal would achieve a net gain. Some amenity grassland would be lost to form the parking area- this could be formed from reinforced grass if possible. A new pathway would also require some clearance of vegetation. Landscaping will need to increase the site's value for wildlife

In order to maximise wildlife value of landscaping, the following should be considered: Short flowery lawn mix for amenity grassland, climbers, fruit trees, new native hedges on boundaries, log piles, enhancing existing hedges with trees/ additional species, re-seeding disturbed areas with wildflower meadow mix, and creating wetland features for surface and treated water discharges.

Landscaping scheme should be secured via condition.

Drainage

No surface water drainage scheme has been provided. We advocate an integrated approach that maintains existing site hydrology, makes the best use of water in the landscape and maximises biodiversity value. Balancing features need to be outside of the floodplain. Here, roadside swales could be an option to mitigate water run off further from the boathouse. Water butts and rainwater harvesting are also potential features to consider.

Foul drainage would need to ensure no impact to the surrounding environment. Low-water or composting toilets might be an option to consider.

It is not yet clear whether a suitable system can be achieved, and given the sensitive nature of the surroundings this is essential to determine at this stage.

Bats

Two species of bats were recorded roosting within the building:

1 x common pipistrelle entering the buildings south-east elevation, roosting externally within the eaves area.

1 x brown long-eared bat entering the buildings south-west elevation, flying around the interior before roosting above the mezzanine level.

The common pipistrelle bat roost located on the buildings south-east elevation, can be retained as no works are proposed to the roof area. The brown long-eared roost located internally will be lost as a result of the building conversion. A bat licence will be required for works.

The LPA must consider the 3 tests under Habitat Regulations:

- 1. 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 '*
- 2. there must be no satisfactory alternative that will cause less harm to the species*
- 3. 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.*

It is not clear that the brown long eared bat roost needs to be impacted. Brown long-eared bats roost and fly in larger internal spaces and the loss of this would not be well mitigated with a bat box. The roost could potentially be retained within the building conversion, whether by leaving the area untouched or boarding off part of the roof void for use by bats, and this alternative does not seem to have been considered.

Regarding test 1, the LPA must determine whether the proposals constitute an imperative reason of public interest, which would override the impacts to bats.

We do not feel the tests have been met and require more information on the possibility of retaining the roost in situ.

Regards,

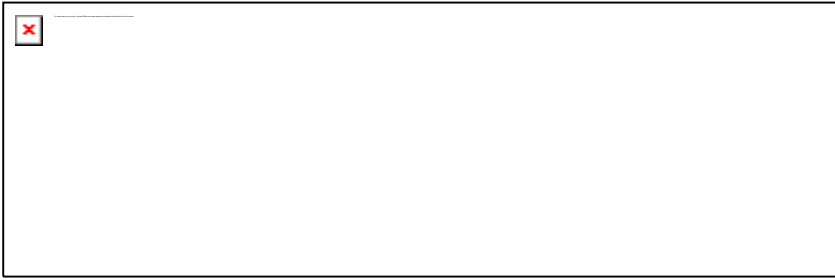
Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



Please note, ecology advice is provided to SMDC 2 days per week- working days are normally Tuesdays and Thursdays.

Planning consultations



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