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**From:** Andrew Dukesell  
**Sent:** 19 October 2022 16:19  
**To:** Planning For Nature; Paul Faircliff; Lisa Jackson; Planning Comments (SMDC)  
**Cc:**  
**Subject:** RE: SMD/2021/0499 10, Cheadle Road, Cheddleton  
**Attachments:** P1100803 - Copy.JPG; 2141 Bridge Cottage PL04B Outbuilding Plans 1-100 A4.pdf

**Categories:**

Dear Lisa

In response to the comments made by Kate Dewey, to address the proposed rooflight initially. The ceiling inside the bedroom is vaulted, sloping to the front and rear to the roof purlin support position in the middle of the roof slope. Due to the changes in levels in this area it means that the window is almost in line with pedestrians on the footpath. The room itself is quite dark, shaded by the trees on adjacent land and is even more so with privacy shading/blinds. The introduction of the rooflight will provide a lot more natural light into the dark room and reduce the need for electric light during the day.

To address Test 1, In the first instance, the age of the property and condition of the roof with slipped tiles allowing for the ingress of bats it would require a replacement of the tiles on a like for like basis in the near future regardless of the presence of bats roosting. Therefore they would be displaced anyway.

The existing property is a solid brick wall construction, as such it has very little insulation value dating back to times when coal fires were kept lit for cooking and warmth and the brickwork as a result absorbed this warmth. Older terrace properties are of a similar nature in construction, but have the benefit of borrowed insulation by virtue of the neighbouring properties either side providing shelter from the weather. The subject property is a detached dwelling, isolated from neighbouring properties and quite exposed to the natural funnelling effect of winds down the canalside, making the property quite cold. Clearly we have moved on from the good old days of coal fires, and Governments drive towards zero carbon in homes by 2050. Aside from the external proposals that require planning permission, the owner is also lining the property internally with insulation to meet current building regulations in a bid to improve the conservation of energy within the property. The result of this action does of course reduce the internal sizes of the rooms, the existing family bathroom is extremely small, bearing in mind the property dates from a period when the family bathnight took place in the lounge front of the fire in a tin bath, so the space has been created with the footprint of the original structure. The proposal to extend to the rear not only provides the additional space to meet the current expectations a 21<sup>st</sup> century family want for health and hygiene in a property with a WC on the ground floor and also a reasonable size family bathroom, but the extension having a modern insulated cavity wall construction shall provide increased thermal efficiency to the property to the rear corner of the property where the prevailing winds from down the valley originate.

In short the proposed project would provide a more sustainable, modern, energy efficient home for a growing family and therefore is of imperative public interest of a social and economic requirement, aligned with the government ambition of being a net zero economy by 2050. Reaching net zero means tackling all sources of emissions – and heating for homes and workspaces makes up almost a third of all UK carbon emission. Better insulated homes will reduce energy consumption and lower bills, alongside health benefits.

It is interesting to note that Natural England do not need a reasoned statement when applying for a bat licence for this type of development: <https://www.gov.uk/government/publications/reasoned-statement-to-support-a-mitigation-licence-application/protected-species-licences-when-to-include-a-reasoned-statement-with-your-application>

Extract below from the government website:

When you don't need a reasoned statement

## Applications for home improvements and small scale housing developments

### Bats

You don't need to include a reasoned statement where bats and their roosts will be affected by:

1. Repairs and maintenance
2. Roof replacements, loft conversions and extensions
3. Renovations of existing domestic dwellings and associated structures, such as garages

In conclusion I suggest that Test 1 of the Habitat Regulations is met, the proposed plan provides mitigation for the loss of roosting place, with replacement purpose designed spaces as advised by the ecologist report by Apex Ecology.

The additional requirement for bird boxes is acceptable however it is my understanding that swift boxes should be generally under the eaves, north(ish) facing out of direct sunlight, also having clear access for flight. The exposed eaves we have is south facing, also obscured by trees, and the north facing would be obscured by the other part of the roof. The only suitable position I believe we have for swift boxes would be the north facing eaves, but this would be on the canal side overlooking the bridge section of the canal, which is under separate ownership, and would pose major logistical / health safety issues to actually place them there.

We have added some simple bird boxes to the replacement out building on the attached plan

If there are any queries, or further information is required, please do not hesitate to contact me.

Kind regards Andrew

**Andrew Dukesell**

For and on behalf of



**DBD Architectural Consultancy Ltd**

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**From:** Planning For Nature <

**Sent:** 11 October 2022 15:30

**To:** Lisa Jackson <Planning Comments (SMDC)  
<PlanningComments@staffs Moorlands.gov.uk>

**Cc:**

**Subject:** SMD/2021/0499 10, Cheadle Road, Cheddleton

**SMD/2021/0499**

**10, Cheadle Road, Cheddleton, Staffordshire, ST13 7HL**

**Rear two storey extension and other renovations including window replacements.**

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**

No objection subject to test 1 of the Habitat Regulations being met, and suitable conditions for bats and birds being applied.

## **Bats**

The Further Survey of Building for Bats dated August 2022 by Apex Ecology was conducted well, and found that Common pipistrelle bats use the building in small numbers for roosting-below roof tiles and around fascia boarding on the gable end walls. Most were roosting in the northern part of the building, whose roof will be unaffected. One bat was seen emerging from the roof near to the chimney of the southern part of the building (Void 1). This roofspace will be impacted by the extension roof being joined to the existing void, and a new rooflight being added to the front elevation.

The works will require a bat licence, either an individual licence or under the 'bat mitigation class licensing' (BMCL) scheme. Mitigation proposed includes maintaining existing bat access points, providing new roost features, and precautions to be undertaken during works.

Plans as Proposed PL03E dated 7<sup>th</sup> September 2022 show new raised ridge tiles for bats on the impacted roof and new extension roof.

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.*

I consider that test 3 will be met.

Alternatives could be to avoid joining the new roof to the existing roof, and to leave out the additional rooflight. I cannot see how the rooflight will add light to the main bedroom, unless this part of the roof is within the room, and not the loft void? However, the new extension roof would present more new opportunities for bats. In either case, none of the new features would necessarily impact on the bat access point by the chimney, so as long as this is maintained I think that minimal harm to the species would be caused.

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

A model condition should the application be approved:

The proposed development is to proceed in accordance with the recommendations made by section 4 of the submitted Further Survey of Building for Bats (Apex Ecology Ltd, Dated August 2022) unless varied by

a European Protected Species licence subsequently issued by Natural England. Agreed features for roosting bats shall be permanently installed in accordance with the approved details.

Reason: To safeguard protected species in accordance with the NPPF.

## Birds

The plans would need to compensate for the loss of bird nesting opportunities in the outbuilding (new nest features could be built in when it is re-built), and this should be secured via condition. Swift bricks built into the top of the new extension would also be positive in this location.

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- please send to [planning@staffs-wildlife.org.uk](mailto:planning@staffs-wildlife.org.uk)



**Are you a member of the Wildlife Trust? Less than 10p per day will help us protect and enhance the wildlife and wild places of Staffordshire. [Please join today!](#)**

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