
From: Richard Millington
Sent: 02 December 2022 11:18
To: Planning For Nature
Cc: connor wild; Johnston, Christopher; Planning Comments (SMDC)
Subject: Re: SMD/2022/0535 Bank Farm

Categories:

Hi Kate,

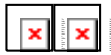
Connor is having an onsite meeting on Monday morning with the client, so we will be able to advise more after this. My concern would be that this outbuilding does not have any baseline to work off yet, so we do not know the existing bat populations that may be present within. It could be totally unsuitable, but we were only commissioned to survey the property, and as a result I cannot see that Matthew has taken any photos or made any notes of this outbuilding.

Kind Regards,



Richard Millington BSc (Hons), ACIEEM, CERPIT
Director and Principal Ecologist , Elite Ecology

| **Head Office:** Wellesley House, Wellesley Street, Stoke-on-Trent,
Staffordshire, ST1 4NF



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---- On Thu, 01 Dec 2022 16:33:52 +0000 **Planning For Nature <planningfornature@staffs-wildlife.org.uk>** wrote ---

Many thanks Connor,

I thought the further surveys probably had been done but they have not been formally submitted.

The proposed plans are dated November 2021 and do not show any bat mitigation. I will have a look at the report and submit further comments- at this stage it will be a holding objection due to no mitigation being proposed.

Are there other options on the site? The location plan shows an outbuilding to the rear, but this may no longer be there. A modified or new bat house/ outbuilding might be an option perhaps?

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

07494852383

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

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On Thu, 1 Dec 2022 at 14:29, Connor Wild <connor@eliteecology.co.uk> wrote:

good afternoon Kate,

We have already undertaken the bat surveys, please find the attached report.

We are not sure if the mitigation has been secured in the plans as the client is claiming that there will be no room to stand in the structure if the features are included.

Kind regards,

Connor Wild MSc, Ecologist

01782 308418 | connor@eliteecology.co.uk | <http://eliteecology.co.uk/> |

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---- On Thu, 01 Dec 2022 13:46:33 +0000 **Planning For Nature** <planningfornature@staffs-wildlife.org.uk> wrote ---

SMD/2022/0535

Bank Farm, Roughcote Lane, Caverswall, Staffordshire, ST11 9ET

Proposed change of use of vacant building to dwelling.

Staffordshire Wildlife Trust provides ecology advice to Staffordshire Moorlands District Council as part of a service level agreement.

SUMMARY – HOLDING OBJECTION - There is currently insufficient information to determine the full ecological impact of the application and to demonstrate there will be a biodiversity net gain, where possible.

Preliminary Bat Roost Assessment (PRA)

The Preliminary Roost Assessment dated August 2022 by Elite Ecology Ltd confirmed that the building supports a bat roost of brown long-eared bats, as droppings were found and confirmed by DNA analysis. These may not be the only bats using the building, and further surveys to determine bat usage are required. The report states that a minimum of three further bat activity surveys are required during the bat survey season of May to September (inclusive). It states that surveys have been scheduled, but no further report has been submitted. This is required in order to judge impacts to a protected species and to consider the 3 tests under the Habitat Regulations.

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 should show, through landscaping, a small net gain where possible, such as vertical planting of climbers.

All new buildings should include new bat and bird features as appropriate to the structure:

House sparrow nest terrace, house martin cups, starling nest boxes

2 storey buildings and taller- swift boxes

Rural buildings facing onto open countryside over 1km from major roads and rail lines- barn owl box

A landscaping scheme should be secured via condition if appropriate to the site.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

07494852383

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