
From: Planning For Nature
Sent: 08 December 2022 08:00
To: Lisa Jackson; Planning Comments (SMDC)
Cc: Richard Millington
Subject: SMD/2021/0809 10 Mill House, Stallington Road

Categories:

SMD/2021/0809

10 Mill House, Stallington Road, Blythe Bridge, Staffordshire, ST11 9PN

Erection of replacement dwelling and detached garage

0.17 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 – Further information required.

Required prior to determination:

1. Clarification as to bat box locations and timing of mitigation provision- to be shown on proposed plans.
2. Consideration of tests 1 and 2 under the Habitat Regulations

Secure via condition should approval be granted:

3. Landscaping plan including biodiversity net gain features
4. Drainage scheme including Suds
5. Bat sensitive lighting plan should external lighting be proposed
6. Bird nesting features details

Documents reviewed:

- Preliminary Ecological Appraisal May 2021 by Elite Ecology
- Bat Activity Report September 2021 by Elite Ecology
- Otter and Water Vole Survey Report (August 2022) Elite Ecology
- Herptile Method Statement (July 2022) Elite Ecology
- Tree Survey and Arboricultural Impact Assessment July 2021 Elite Ecology
- Construction Exclusion Zone and Working Method Statement dated September 2022 by Elite Ecology
- Planning Drawing 4606_3 Rev D 29 November 2021

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.'

The proposal appears likely to result in a neutral effect on biodiversity in terms of habitat- this would depend on any landscaping changes made. The PEA report makes some recommendations as to wildlife features that could be incorporated.

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, enhance existing hedges with trees/ additional species, re-seeding disturbed areas with wildflower meadow mix, and creating wetland features for surface and treated water discharges.

A landscaping scheme should be secured via condition.

Drainage

Surface water is proposed to be dealt with via a soakaway, foul drainage is unknown.

Due to the proximity to a waterbody, drainage is an important element, and therefore a drainage plan should be secured via condition. This should seek to minimise rainwater run-off through SuDs principles including water butts, rainwater harvesting where possible, permeable surface and incorporation of infiltration basins or swales within landscaping.

SPECIES

Bats

No trees are to be removed according to the submitted Tree Survey report.

The house (to be demolished) and the outbuilding (to be retained) were deemed to have low bat potential. Three activity surveys were then carried out on the house in July, August and September 2021. These found that the house roof supports day roosts of common pipistrelle (*Pipistrellus pipistrellus*) bats, which were accessing the roof in at least 4 locations. The demolition of the house would result in the loss of these roosts, therefore a bat licence from Natural England is required.

Proposed mitigation:

- Timing of work restricted, licenced ecologist to supervise soft demolition, 1FS Schwegler Large Colony Bat Box or similar to be installed on a tree the morning of the commencement of the bat inspection.
- Compensation for the common pipistrelle roosts- two Eco Bat Boxes 'installed on the structure as close to the existing roost as possible.'
- Five bat access tiles and two purposefully lifted ridge tiles installed on the new house roof; no breathable roofing membrane is to be used.
- Lighting to be bat sensitive via lighting plan if necessary

As the structure (house) is to be demolished, it is not clear whether the Eco Bat boxes are to be installed on the new house? There will be a significant time lag between destruction of the roosts and building of the new house. Therefore it would be better to locate bat boxes, and/or further permanent roost features within either the retained outbuilding (building 2), or the proposed new detached garage if this can be built prior to the house demolition. The location and timing of bat features needs to be clarified and also shown on the proposed plans.

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.*

We consider that test 3 would be satisfied if the bat mitigation can be clarified and plans provided to show features/ locations.

Regarding test 1 and 2, the LPA must determine whether the proposals constitute an imperative reason of public interest which would override the impacts to bats, and that there are no satisfactory alternatives.

Birds

No evidence of bird nesting was found. Recommend inclusion of new bird nesting features specifically for swifts, house sparrows and house martins on the new dwelling. Details to be submitted via condition.

Great Crested Newts, Amphibians and Reptiles

The submitted method statement is suitable for ensuring any animals present are protected during works.

Otters and Watervole

The survey found signs on the river Blithe and possible water vole holes in the banks of the mill pond, but nothing within impact distance of the works. No action necessary other than pollution prevention measures. The Construction Exclusion Zone and Working Method Statement dated September 2022 by Elite Ecology is welcomed.

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



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