

From: [Planning For Nature](#)
To: [Johnston, Christopher](#)
Cc: [connor](#); [Planning Comments \(SMDC\)](#)
Subject: SMD/2021/0589 Springfield Farm
Date: 24 January 2023 19:46:21

SMD/2021/0589

Springfield Farm, Consall Lane, Wetley Rocks, Staffordshire, ST9 0AA

Change of use of farm buildings to living accommodation

0.34 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 – No objection, subject to consideration of 3 tests for bat impacts, and subject to conditions.

Required prior to determination:

1. Consideration of alternatives to bat roost disturbance to minimise impacts, and whether the proposal constitutes an imperative reason of public interest.

Secure via condition should approval be granted:

1. Bat mitigation as set out in the Bat Activity Survey August 2022, Elite Ecology
2. To be included on updated plans as per the Bat Activity Survey August 2022, Elite:
 - a. A variety of bird boxes installed within the landholding.
 - b. Compensation swallow nesting features included within the building design.
3. Bat-friendly lighting plan
4. Landscaping plan
5. Drainage plan (if required).

Documents reviewed:

- Preliminary Roost Assessment November 2021, Elite Ecology
- Bat Activity Survey August 2022, Elite Ecology

HABITATS

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'

A net gain should be achievable with suitable landscaping enhancements. This could include some of the following: 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, create a pond or wetland for surface and treated water discharges. ***A soft landscaping plan should be secured via condition.***

Drainage

If new drainage infrastructure is proposed, a drainage plan following SuDS principles should be secured via condition.

SPECIES

Bats

The PRA report in 2021 found the buildings to have bat potential and that buildings B1 and B3 required a minimum of two activity surveys, and B2 one, with 5 surveyors to adequately cover the structures.

Activity surveys were carried out in May 2022. Due to the discovery of a bat roost, a third activity survey was required and carried out in July 2022. 5 surveyors were used. Survey conducted to a good standard.

B1 and B3 support day roosts of at least 6 common pipistrelle bats, which emerged from a number of exit points on the buildings. B2 did not support bats.

The proposed works involve converting the existing barns to residential dwellings. It is not clear whether the roofs will be repaired or the bat access points affected. B3 has recently been re-roofed, and the roof of B1 is in fairly good condition. The roof of B2 would be replaced with no impact to bats. However, there are also cracks in internal walls within B1. We feel that some impacts could be avoided by identifying bat roosting points and leaving these in situ wherever possible.

The report concludes that a Natural England development licence will be required.

Mitigation involves working within a timeframe that avoids bats and under supervision from an ecologist to check crevices for bats before potential roost areas are impacted. Bat boxes and bat access tiles are proposed and shown within the report. These appear suitable. Where possible, an integrated bat box should also be provided to replace potential roosting spaces in wall cracks.

Bat-friendly lighting is also essential and a lighting plan, if necessary, should be secured via condition.

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 has been satisfied.

Less harmful alternatives could be to avoid any impacts to bat roosts by retaining features in situ where possible.

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

Model condition:

The proposed development is to proceed in accordance with the recommendations made by section 5 of the submitted Bat Activity Survey (dated August 2022, Elite Ecology) 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

Birds were seen to emerge from the eaves of B1 and B3, and two swallow nests were found in B1.

A variety of bird boxes are recommended on site as mitigation for loss of nesting sites. For swallows, eaves/ridge overhangs or easily accessible loft spaces are advised with 4no. swallow nest cups within them. B2 the single storey section may be suitable for a boxed-off area in the roof for swallows with an access hole.

Updated plans showing swallow compensation and other bird box enhancements to be secured via condition.

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



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