

Dear Rebecca Bowers,

SMD/2024/0085

Conversion and alteration of 2no. agricultural buildings to form 2no. dwelling houses and associated works

0.266 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.

The application is a Full – Minor application for the conversion of two traditional agricultural buildings (buildings B1 and B2) each into a single dwelling. The buildings are currently disused.

We have viewed the following documents:

- Application Form - dated 19th February 2024;
- Planning Statement - dated February 2024;
- Block Plan as Existing - Drawing 1848-11 - undated; and
- Block Plan as Proposed - Drawing 1848-12 – undated.

SUMMARY – a **Holding objection** to the proposals is recommended due to further detail on the use of the site by bats and further detail on compensation and mitigation for bats.

Required prior to determination:

1. An assessment of the hibernation potential of buildings B1 and B2 is required, comprising a statement as to whether hibernation potential can be ruled in or out of these two buildings;
2. Clarification as to the potential for bats to be using other buildings on or adjacent to the site (B5, B6 and B7 on the Block Plan – existing drawing) or a justification as to why these buildings are excluded from the bat survey report should be provided; and
3. Further detail in respect of mitigation/compensation for bats and their roosts is requested, including for hibernation potential if required.

Conditions are also recommended for a small number of other ecology items.

DESIGNATED WILDLIFE SITES

No designated wildlife sites are present within the site.

Marshes Hill Common Local Nature Reserve (LNR) is within 1km of the site and Stonehouse Drumble Local Wildlife Site (LWS) is within 500m of the site. They are considered sufficiently distant to remain unaffected by the proposals.

HABITATS

The site comprises buildings B1 to B6 and associated land around these buildings, however, it is not clear the extent to which any loss of habitat is likely under the proposal. There appear to be some trees on the boundary of the site and while the indication is that these trees are to be retained, which is welcomed, this should be confirmed and measures to protect the rooting zone of these trees provided. This could be secured through planning condition.

The MAGIC¹ interactive map indicates a potential traditional orchard Priority Habitat to the north of the site associated with the farmhouse. The proposals are not anticipated to affect this orchard area, based on the information reviewed.

BIODIVERSITY NET GAIN

The Application Form identifies the scheme as being exempt from Statutory Net Gain by virtue of it being a non-major development submitted to the Local Planning Authority prior to 2nd April 2024. Based on the information reviewed, we agree that the proposal meets this exemption criteria.

PROTECTED SPECIES

Bats

The Application Form identifies that protected species are present on the site and a detailed bat survey report is provided for buildings B1, B2, B3 and B4. The report is suitably recent (dated 2023) and the survey methods and approach is comprehensive.

In summary, the bat survey results were reported as:

- Buildings B3 and B4 were found to have no evidence of roosting bats, and;
- Buildings B1 and B2 together were found to host roosts of at least five separate species of roosting bats including maternity roosts for Natterer's bat (*Myotis nattereri*) and brown long-eared bat (*Plecotus auritus*) as well as summer day roosts for common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) whiskered bat (*Myotis mystacinus*) (and a whiskered/Brandt's bat (*Myotis brandtii*) roost – potentially increasing the number of bat species to six).

As such, the site is considered an important location for summer roosting bats, including supporting breeding colonies of both Natterer's and blown long-eared bats.

The scheme proposes the inclusion of two 'bat loft' features, one in each building (B1 and B2), plus a number of bat boxes to provide alternative roosting areas for the variety of bat species present on site.

The report includes outline advice on the design of each 'bat loft' and references the number and type of bat boxes recommended. This is to be welcomed and potentially secures roost opportunities on the site for local populations of bats. However, due to the presence of a large Natterer's bat maternity colony (66 individual Natterer's bats counted at building B1 on 29th August 2023) and the specific roosting requirements of this species, the following further information/clarification is requested:

- Clear narrative on how the features within the proposed mitigation/compensation approach will support the breeding colony of Natterer's bats, bearing in mind their specific roosting requirements and the significance of a breeding colony of this size, referring to examples of similar mitigation where available;
- An assessment of whether the larger 'hay loft type' proposed access point will be at risk of allowing birds (particularly birds of prey) to enter the 'bat loft' and how this would be managed if needed;
- An assessment of how the construction schedule impacts on the use of the building by the maternity roost colonies (i.e. is there a risk that the maternity colonies may be left without a suitable roost location for one or more breeding season as construction proceeds); and

¹ <https://magic.defra.gov.uk/MagicMap.aspx> (viewed 29/04/2024)

- A plan of where the bat boxes proposed for the site will be located, to ensure the site can accommodate the number and designs specified.
- Clarification on why buildings B5, B6 and (adjacent) B7 are not included in the Bat Survey Report.
- A clear assessment of the hibernation potential of buildings B1 and B2 and information on any mitigation/compensation measures, if required.

Further detail is required on a suitable lighting scheme to ensure any new bat roost features (lofts and boxes) will not be adversely affected by any new lighting scheme and this could be secured by planning condition.

Nesting Birds

The Bat Survey Report identified evidence of nesting birds on site.

- Buildings B3 and B4 were found to have no evidence of nesting birds;
- Buildings B1 and B2 were also found to contain evidence of nesting birds.

The inclusion of additional species-specific compensatory nestboxes in the proposals is welcomed.

A precautionary approach to avoiding harm to nesting birds is recommended for buildings B1 and B2, however would also recommended that any buildings or trees and shrubs impacted by the proposals should be included in this precautionary approach, and the approach should be secured by planning condition.

Regards,

Dated 29th April 2024