

Dear Rebecca Bowers

SMD/2024/0106

Proposed Structural work and renovation/ alterations to change use of barn from Agricultural to C3. Whitehough, Coley Hole, Ipstones, Staffordshire, ST10 2LH

0.17 hectares

Staffordshire Wildlife Trust has been asked to review information provided for 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 a traditional Grade II listed agricultural building into a single dwelling, plus re-roofing of a modern agricultural barn.

We have viewed the following documents:

- Bat and Bird Activity Survey report - dated July 2023
- Location Plan - RLM 099/8, dated February 2024
- Site Plan as proposed, including roof plan -RLM 099/10, dated February 2024
- Elevations of Proposed Barn, as amended – RLM 099/6, dated February 2024
- Ground and First Floor as proposed, revised – RLM 099/5, dated August 2023

SUMMARY – a **Holding objection** to the proposals is recommended due to a request for further details on the proposed bat roost mitigation/compensation design and roost classification.

Required prior to determination:

1. Further detail in respect of mitigation/compensation for bats and their roosts is requested in the form of a Bat Mitigation and Compensation Strategy, and;
2. Further information is required to support the classification of the common pipistrelle bat roosting behaviour within the Grade II listed barn as constituting a single roost (and not multiple smaller roosts).

Conditions are also recommended for other ecology items.

DESIGNATED WILDLIFE SITES

No designated wildlife sites are present within the site.

Whitehough Wood Site of Biological Importance (SBI) comprising ecologically valuable grassland and woodland habitats is within 200m of the site and Blackbank Wood 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 the Grade II listed barn proposed for conversion to a dwellinghouse, a larger modern agricultural building and associated land around these buildings. There appear to be some trees within the wider area but they appear to be unaffected by the proposals.

The Bat and Bird Activity Survey Report states that any new tree/shrub planting should comprise native species and this is to be welcomed.

The report also states that if any mature trees are to be impacted by the scheme, they should be subject to a suitable Ground Level Tree Assessment (GLTA) prior to works, and this is appropriate.

The MAGIC¹ interactive map indicates a number of potential Priority woodland habitats and an area of Priority lowland meadow within 500m of the site. There is a small stream approximately 100m to the south-east the site. The proposals are not anticipated to affect these habitats, 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

A detailed bat survey has been undertaken. The report is suitably recent (dated 2023) and the survey methods and approach are comprehensive. In summary, the results of the survey are:

- The modern agricultural building is reported as having no/low potential for roosting bats.
- A total of nine common pipistrelle bats were recorded as roosting in exterior features of the Grade II listed barn during the surveys in May/June 2023.
- Six/seven brown long-eared bats were recorded as roosting within the Grade II listed barn during the surveys in May/June 2023 – with a note that they were ‘visually verified’ as this species (paragraph 55).
- Bat droppings were noted in the Grade II listed barn during the building inspection report (paragraph 46) but no DNA analysis is reported.
- The report concludes that the Grade II listed barn supports a summer day roost for common pipistrelle bats (associated with numerous external features of the barn) and a maternity roost for brown long-eared bats (associated with the interior roof structure of the barn).
- The report states that overwintering bats may be present within the Grade II listed barn but hibernation potential is assessed as Low.
- Four species of bat were recorded as foraging/commuting on or near to the site over the May/June 2023 survey period, comprising common pipistrelle, brown long-eared bat, noctule and *Myotis* species.
- The report presents ‘preliminary outline guidance’ for mitigation/compensation associated with the confirmed roosts in the Grade II listed building, as follows:
 - Retention of existing crevices in and around the existing stonework.
 - In-built new roost provision such as raised ridge tiles and bat access tiles, and fascia/soffit roost provision.
 - Bat boxes (various designs given).
 - A recommendation for retention of a bat loft measuring a minimum of 2m (h) x 4m (w) x 4m (l) on site incorporating specific features to retain the maternity colony of brown long-eared bats on site.
 - Guidance on points to consider in relation to bat mitigation, including the need for a Natural England development licence in relation to bats and their roosts prior to the development commencing.

The recommendation for inclusion of roosting provision targeted at the bat species and roost types recorded at the site is to be welcomed and the preliminary outline guidance provided is useful.

¹ <https://magic.defra.gov.uk/MagicMap.aspx> (viewed 07/05/2024)

However, the design plans do not refer to any bat mitigation/compensation features, despite some of the recommended roost features requiring a very specific design approach and matters such as location (ie retention of the maternity roost) and seasonality (ie not leaving the breeding colony without a roost) being critical.

Furthermore, the classification of the common pipistrelle roost as a single summer day roost should be justified more fully with evidence to support the statement that this roosting behaviour is able to be considered as one roost (and not multiple roosts).

A more detailed bat mitigation/compensation strategy should therefore be provided, taking account of the general advice provided within the Bat and Bird Activity Survey Report, including for example numbers and locations of crevice roost features, bat loft location and design, and seasonal constraints. This will ensure any proposed bat mitigation/compensation strategy is a feasible option for this scheme.

As such, a holding objection is recommended until a suitable bat mitigation/compensation strategy is submitted along with further justification of the classification of the common pipistrelle roost as one roost site.

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

Nesting Birds

The Bat and Bird Activity Survey Report identified evidence of nesting birds on site, as follows.

- Confirmation of a nesting birds within both buildings on site, including nesting swallow;
- A recommendation of ten swallow nest cups to be installed within the modern agricultural barn to compensate for loss of swallow nest sites across the scheme.
- A recommendation is made to provide the following enhancements:
 - One barn owl nest box.
 - Four general bird nest boxes suitable for passerine finches.
 - Two sparrow terrace nest boxes.

A suitable plan showing specification, location, height and orientation of the nest boxes should be provided. This could be secured by planning condition.

A precautionary approach to avoiding harm to all nesting birds is welcomed and should be secured by planning condition.

Regards,

Dated 8th May 2024