

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 further 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 two traditional agricultural buildings (buildings B1 and B2) each into a single dwelling. The buildings are currently disused.

Previously (letter dated 29/04/2024) a Holding Objection was recommended pending further information pertaining to bats and their roosts on site and proposed bat mitigation/compensation measures. A number of other conditions of planning were also recommended.

Following from the above assessment, we have viewed the following additional documents provided to us:

- Bat Activity Survey Report - dated May 2024;
- Site Plan as Existing - Drawing 1848-05, Rev A – dated 10th May 2024; and
- Block Plan as Proposed - Drawing 1848-12, Rev A – undated.

SUMMARY – a **Holding objection** to the proposals is recommended until further detail on compensation and mitigation for the proposed bat loft designs is received.

Required prior to determination:

1. Further information in respect of the proposed bat loft designs is requested, to provide satisfactory detail to support the assessment that the Natterer's and brown long-eared bat maternity roosts can be maintained on site.

A small number of additional planning conditions are also recommended.

The latest Bat Activity Survey Report (dated May 2024) provides additional information on the status of buildings B5, B6 and B7, which is welcomed.

This report clarified that B5 and B6 held Negligible potential for use by roosting bats with no further bat surveys, therefore, required. The report also clarified that B7 (which is off site but immediately adjacent to the site) was confirmed as having High potential for roosting bats and a small number of bat droppings were found within the interior of this building (bat species as yet unknown – pending DNA analysis results). This indicates that bats are using B7 in some capacity. Building B7 is not within the site boundary, however, bats using this building may be indirectly negatively affected by the proposed scheme through inappropriate external lighting design. Therefore, we welcome the inclusion of B7 in the recommended Artificial Lighting Plan (page 29 of the report).

Further additional detail is however required on a suitable lighting scheme to ensure building B7 (with evidence of use by bats) will not be adversely affected by any new external lighting, and this could be secured by a planning condition.

The Bat Activity Survey Report also provides the requested information on the bat hibernation potential for all buildings (B1 to B7). This additional information is welcomed and confirms that only buildings B1 and B2 have Low potential for hibernating bats (other building being classed as holding Negligible potential).

The precautionary measures to avoid/manage any risk to small numbers of hibernating bats if found on site during demolition, as set out on page 28 of the Bat Activity Survey Report (May 2024) are appropriate and we recommend that these measures are secured by planning condition.

Part of the compensation proposed for bats is the installation of 5no. IFS Schwegler Large Colony Bat Boxes (or similar) on 'nearby trees (facing north)' (page 25). It is recommended that the locations of trees that will support these proposed bat boxes are mapped to ensure there are trees of sufficient size to accommodate this number of large/heavy bat boxes. A plan of the locations of the trees suitable for installation of these bat boxes could be secured by a planning condition.

The scheme proposes the inclusion of two 'bat loft' features, one in each of building B1 and B2 to provide alternative roosting areas for the variety of bat species present on site. The documents reviewed do not appear to provide any additional information on the following points previously raised:

- 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; and
- 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).

Without some information on the above three points of detail on the proposed mitigation measures, we feel we are unable to be reassured that the current roost types and species of bat known on site will be able to be maintained. As such, we recommend a Holding Objection until further suitable information to address the three bullet points above is received.

Regards,

Dated 5th June 2024