

Dear Rebecca Bowers,

SMD/2024/0262

Full planning application for the change of use of a stone barn from ancillary accommodation to open market dwelling with modest extension

Hayes Gate Farm, Star Bank, Oakamoor ST10 3BN

0.084 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 application for the change of use of a single traditional agricultural building (Barn 1) from ancillary accommodation to a single dwelling with extension. This proposal includes the demolition of the nearby traditional stone outbuilding (Barn 2) and re-use of this material as part of the construction of the new proposed extension to Barn 1.

There is extant consent with conditions to enable the conversion of the barn to ancillary accommodation (SMD/2019/0453). We note that bat surveys for this scheme confirmed day roosts of brown long-eared bats at both Barn 1 and Barn 2.

We have viewed the following documents:

- 3849 - 021(A) - A3 - Site location plan (Stone Barn Application)
- 3849 - 022 - A1 - Existing site plan (Stone Barn Application)
- 3849 - 024 - A2 - Existing stone barns one (Stone Barn Application)
- 3849 - 025 - A3 - Existing stone barns two (Stone Barn Application)
- 3849 - 029 - A2 - Proposed site plan
- 3849 - 030(B) - A2 - Proposed stone barn (Stone Barn Application)
- Hayes Gate Farm, Oakamoor - Elite Ecology Bat Activity Report (November 2023)
- 3849_02_Stone Barn PDAS document (May 2024)
- Bat survey report for the extant consent, for background (Penny Anderson Associates Ltd 2017)

SUMMARY – a **Holding objection** to the proposals is recommended due to a request for further information and points of clarification pertaining to the bat survey report.

Required prior to determination:

1. Further information on some aspects of the bat survey and assessment approach is requested.
2. Some inconsistencies identified within the bat survey report should be resolved.

DESIGNATED WILDLIFE SITES

No designated wildlife sites are present within the site or within 1km of the site boundary. No likely effects on designated sites are identified.

HABITATS

The proposal includes Barn 1 and Barn 2 (the latter to be demolished) and associated area of courtyard for the proposed extension. No semi-natural or natural habitats are impacted.

BIODIVERSITY NET GAIN

As the application is classed as a self-build development, we agree that the application is exempt from Statutory Biodiversity Net Gain under the 'self build and custom build development' criteria.

SPECIES

Bats

A Bat Activity Survey Report (dated November 2023) provides a summary of the surveys and results in relation to bats and also assesses the potential for nesting birds. The report confirms the surveys are suitably recent (2023) and follow the appropriate methodologies. This is welcomed.

In summary, the bat survey confirms the presence of two bat roosts in Barn 1, one roost supporting common pipistrelles and the other roost supporting soprano pipistrelles. Barn 2 does not appear to have been assessed.

The recommendation for inclusion of roosting provision targeted at the bat species and roost types recorded at Barn 1 is to be welcomed and the preliminary outline guidance provided is useful.

However, the following points should also be addressed to provide a fuller picture of the status of the site in relation to roosting bats and to ensure the proposed mitigation and compensation proposals are adequate and feasible for the site:

- An assessment of Barn 2 does not appear to have been undertaken, although reference is made to this structure in Table 2 (see below). The rationale for this omission is unclear, particularly in the light of a bat roost having previously been confirmed in Barn 2 (PAA 2017). Further information should be provided to explain the approach taken.
- The report indicates that no internal inspection of Barn 1 was undertaken but later provides a narrative on the interior of Barn 1. The extent of any internal viewing of Barn 1 should be detailed more clearly, even if only through an open door/window, along with any other pertinent information such as constraints.
- Bat hibernation potential of all buildings/structures impacted by the proposals should be considered and suitable mitigation/compensation measures outlined as necessary.
- The likely impacts on roosting bats should be more clearly defined – it is unclear which roosts will be lost or retained for example.
- It is unclear how roost features will be subject to 'soft demolition' (as stated in the report) to protect bats from harm, given that at least some roost features are within wall crevices and Barn 1 does not appear to be subject to demolition/rebuild. More details of the mitigation approach are required to ensure the proposed approach is feasible.
- Confirmation that the proposed 'integrated' bat boxes are suitable for installation into the fabric of Barn 1 is required, given no demolition appear to be proposed. Externally fitted bat box designs and/or built in crevice features such as bat tiles and raised ridge tiles should be considered.

There are a small number of inconsistencies in the report which should also be resolved for the sake of clarity, as follows:

- The report refers to the soprano pipistrelle roost at Barn 1 as both a 'maternity roost' and a 'day roost' in different parts of the report. Clarification on the type of soprano pipistrelle roost present in Barn 1 is required.
- The report presents differing dates and dusk/dawn permutations of the surveys and it is unclear which dates the surveys were undertaken on. This should be checked/clarified.

- Table 1 title suggests results for Barn 1 and Barn 2 surveys are presented, but only Barn 1 data are provided. This should be clarified/amended.

We look forward to receiving the updated bat report after which we can provide further commentary and recommendations as appropriate.

Regards,

Dated 19th July 2024