

Dear Rebecca Bowers,

SMD/2024/0276

Full planning application for a replacement dwelling

Gorsty Hill Farm, Gorsty Hill Road, Upper Tean ST10 3BN

0.18 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 a replacement dwelling at the site. This proposal includes the demolition of the existing single dwelling and the erection of a new single dwelling.

We have viewed the following documents:

- 23682-01 -Existing north and south elevations
- 23682-02 - Existing east and west elevations
- 23682-03 – Existing floor plans
- 23682-04A – Proposed elevations
- 23682-05A - Proposed floor plans
- 23682-06 – Proposed car port
- 23682-07 - Location
- 23682-08 – Site plans
- Farmhouse at Gorsty Hill Farm, Gorsty Hill ST10 4EL - Bat Survey Report (Biome Consulting June 2024)
- Design and Access Statement (N Forrester, undated)

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

Required prior to determination:

1. Further information on some aspects of the bat survey and assessment interpretation is requested, to ensure the rationale for selecting the status of the bat roosts/roosting potential at the site is clear.

A small number of conditions are also recommended.

DESIGNATED WILDLIFE SITES

No designated wildlife sites are present within the site. Freehay Wood ancient woodland is found within 200m of the site boundary and Cecilly Brook Local Nature Reserve (LNR) is more than 1km north of the site. There are, however, no likely effects on these sites due to the nature and scale of the proposed development.

HABITATS

An area of Priority Woodland and an area of Priority Lowland Heathland are found within 120m of the site boundary. There are, however, no likely effects on priority habitats identified, due to the nature and scale of the proposed development.

The proposal includes existing dwelling house, associated yard and access drive along with the existing retained lawn and boundary hedge. No habitats are predicted to be lost as a result of the proposals.

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 Survey Report (dated June 2024) 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 (2024) and follow the appropriate methodologies using up to date guidance.

In summary, the bat survey confirms the presence of a bat roost supporting brown long-eared bats (BLE) located in the roof void of the property. Based on the survey information gathered the roost is classified as a day roost with a maximum of 2 individual bats counted (three bats in total were recorded over the two dusk surveys). All bats observed emerged from below a ridge tile.

The building also offered Medium potential to support roost of other bat species although only BLE were observed to emerge during the dusk surveys.

We note that the two emergence surveys covered the May/early June period. And 'various aggregations' of bat droppings (including older droppings which suggests a well-established roost) are reported to be present in the roof void.

Given the above, further information is requested on how the presence of a maternity roost used by BLE has been ruled out at this site. The presence of a maternity roost would result in the requirement for different mitigation/compensation measures than are currently proposed.

The report also identifies the property as holding some potential for hibernating bats, as a 'non-classic' hibernation roost, however the level of potential (High, Medium or Low) is not stated. This should be clarified with reference to the guidance presented in Collins (2023) Figure 4.1 to ensure the correct level of hibernation potential is allocated to the property. Suitable mitigation/compensation measures should then be presented as required.

As such, a holding objection is recommended until further information is provided to confidently rule out maternity roost presence given the early season surveys and accumulation of droppings in the roof void. Similarly, further information is needed to clarify the correct level of hibernation potential in line with current guidance. Should any adjustments be made to the roost status/type suitable mitigation/compensation measures should also be made.

The report provides an outline approach under the future bat licensing system, including a toolbox talk, supervision of works to roost area, process for capture and safe relocation of bats and limitations on working in poor weather conditions, which is welcomed.

Proposed compensation/enhancement measures (assuming the roost classification does not change following the requested further analysis/information above) includes the following:

- Installation of x2 1FF Schwegler bat boxes with rear panel on two trees on the landowners holding.
- Inclusion of raised ridge tiles with suitable traditional bitumen 1F roofing felt (not modern roofing membranes).

The above proposals are appropriate (assuming the roost status remains as a summer day roost for BLE and no Medium/High potential for hibernation roost use is identified). New roost provision should

be secured by planning condition as part of an ecological enhancement plan as it may not be included in a future bat licence.

Should the re-evaluation of these data indicate a roost of higher conservation value is present, then mitigation and compensation measures should be adjusted in line with this.

Outline recommendations are provided to minimise the potential impacts of additional lighting on the habitats on the periphery of the site. This is welcomed and should also include avoiding lighting on/around any ecological features installed (bat/bird boxes). Lighting design should refer to the latest guidance (ILP 2023) for suitable lighting design. A suitable lighting plan should be prepared and can be secured by planning condition.

Birds

No evidence of nesting birds was identified during the survey.

It is recommended that at least one bird nest box is included in the ecological enhancement plan, to support one or more of the following species – house sparrow, starling, swift, house martin, or swallow. This will be in line with the Staffordshire Moorlands District Plan for Nature (September 2023¹). A plan showing the location and type of bird nest box(es) can be secured by planning condition.

Although no nesting birds were encountered at the time of the survey, a precautionary approach to avoiding harm to all nesting birds (for example, a pre-works check if within the key nesting season) would be welcomed and could be secured by planning condition.

Regards,

Dated 19th July 2024

¹ [https://www.staffsmoorlands.gov.uk/media/9299/Staffordshire-Moorlands-Plan-for-Nature-Sept-2023/pdf/Staffordshire Moorlands Plan for Nature Sept 2023.pdf?m=1718117668490](https://www.staffsmoorlands.gov.uk/media/9299/Staffordshire-Moorlands-Plan-for-Nature-Sept-2023/pdf/Staffordshire_Moorlands_Plan_for_Nature_Sept_2023.pdf?m=1718117668490)