

Dear Ben Hurst

SMD/2024/0243

**Demolition of agricultural buildings and erection of a single dwelling with associated curtilage, parking, hard and soft landscaping works
New House Farm, Luzlow Lane, Bagnall, Staffordshire, ST9 9JZ**

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.

We have viewed the following documents:

- Existing Conditions – Drawing ref: 2019-2465-29, dated April 2024
- Planning Proposal Site Plan - Drawing ref: 2019-2465-30, dated April 2024
- Design and Access Statement, Sammons Architectural, April 2024
- Bat Activity Survey Report, Elite Ecology, October 2022

SUMMARY – Having reviewed the information provided we have a **holding objection**, further information required:

1. Update bat survey

Secure via condition should approval be granted:

2. A copy of the approved bat licence or evidence to confirm that a bat licence is not required.
3. Timing of demolition in relation to nesting birds
4. Details/specification for species mitigation and enhancement measures i.e. artificial nest and bat roost features.

BAT LICENCE

We have reviewed the Bat Activity Survey Report (Elite Ecology, October 2022). The bat survey was conducted by suitably experienced ecologists during suitable weather conditions. However, as highlighted in the report two of the survey visits were completed outside of the optimal survey season, in particular Visit 3 on 20th September 2022 and this may have impacted on the survey results. In addition, the bat survey data is now 2 years old.

We note that day roosts for six common pipistrelle bats and one brown long eared bat were confirmed within building B1 (the building to be demolished under this application).

We have considered the validity of the bat survey data and its suitability to support the planning application and advise that in this case, due to the potential for the status of the bat roosts and associated mitigation measures to have changed, it will be necessary for update bat surveys to be completed.

Ideally, the update surveys should be completed in spring/early summer 2025 to capture the early part of the bat survey season. However, we confirm that update surveys conducted during suitable

weather conditions and spread out over the August/early September 2024 period would be acceptable in this case.

We would be pleased to review and provide further comments on receipt of the update bat survey data, including bat mitigation requirements.

Should a greater number of brown long eared bats and/or a more important type of roost e.g. maternity roost be confirmed during update bat surveys, it may be necessary to provide a more substantial replacement roost feature such as a loft void and this may involve changes to the design of the proposed development.

As acknowledged in the Design and Access Statement (2024) due to the presence of roosting bats, a bat licence will be required from Natural England before demolition can proceed. We recommend a planning condition to require a copy of the approved Natural England bat licence or evidence that a bat licence is not required, to be submitted prior to commencement of demolition.

NESTING BIRDS

We note that swallow nests are present in part of the existing agricultural barn complex to be demolished (building B2 in the bat survey report). No demolition should take place during the bird breeding season (1st March to 31st August inclusive) to avoid harm or disturbance to nesting birds. This can be secured via planning condition.

BIRD NEST AND BAT ROOST PROVISION

We note and welcome the recommendation in the bat survey report for the installation of swallow nest cups to mitigation for the loss of swallow nests in building B2. We recommend that six artificial nest cups are provided to mitigate for three nests that will be lost, plus an enhancement of three extra nest cups.

The requirement for replacement bat roost features will depend upon the results of the update bat survey but as a minimum we recommend the advice in the bat survey report is adopted and incorporated into the design i.e. an external cavity box on the eastern elevation of the new dwelling to accommodate brown long eared bat and access roof tiles and lifted ridge tiles along with crevice bat boxes for common pipistrelle bats.

The number, type and location of artificial swallow nests and bat roost features (suitable to accommodate both brown long eared bat and common pipistrelle bat) can be secured by planning condition.

It should be noted that additional replacement bat roost features may be required under the Natural England bat licence.

Regards,

Dated 5 August 2024