

Dear Chris Johnston

SMD/2024/0361

Change of use of single storey agricultural building to dwelling and associated external domestic amenity; new vehicular access; temporary siting of static caravan.

Single storey brick built agricultural building to North West of, Cloud Park Farm, Dial Lane, Congleton, Staffordshire, CW12 3QJ

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:

- Site Block Plan, drawing CPFB-03, dated 17/3/22
- Site Block Plan As Proposed, drawing CPFB-101-Rev B, dated 7/5/24
- Preliminary Ecological Appraisal (PEA), Elite Ecology dated July 2022
- Bat Activity Survey Report, Elite Ecology dated September 2022
- Design and Access Statement, Ian Ankers Architecture dated 31/7/24

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

1. Update Bat Survey

Secure via condition should planning consent be granted:

2. Precautionary Method Statement for Protected Species, amphibians, nesting birds, hedgehog and reptiles
3. Sensitive lighting scheme to minimise disturbance to wildlife
4. Method Statement for invasive non-native species
5. Details of protected species mitigation and enhancement features, namely bird boxes and bat roost features

UPDATE BAT SURVEY

The Bat Activity Survey Report (Elite Ecology, September 2022) is out of date and an update bat survey is now required. The update bat survey should include an update Preliminary Roost Assessment (PRA) as well as dusk activity survey(s) which must be completed at the appropriate time of year in accordance with current best practice for bat surveys.

The PRA should include an updated assessment of potential for the barn to support nesting birds, including but not limited to blackbird, wren, barn swallow and barn owl.

PRECAUTIONARY METHOD STATEMENT FOR PROTECTED SPECIES

We have reviewed the PEA report (Elite Ecology 2022) and note that the site contains habitats that are suitable to support protected species, amphibians, nesting birds, hedgehog and

reptiles. This includes the potential for the barn to support nesting birds, comprising blackbird, wren and barn swallow which were recorded nesting within the barn during the PEA survey in 2022.

Although not included in the 2022 PEA survey area, it appears that there is a small tree located on Gosberryhole Lane which may be impacted by the proposed access track and this may have the potential to support nesting birds.

Detailed surveys for protected species (other than bats) are not considered necessary in this instance due to the relatively small extent of the site and associated habitats, although the update bat survey (see above) should include an assessment of the barn to support nesting birds.

However, to avoid disturbance or harm to protected species it is recommended that a Precautionary Method Statement is provided, and this should include details of sensitive timing and methods of work, including timing of works to avoid the bird nesting season, pre-commencement inspections and ecological supervision of vegetation clearance. The requirement for a method statement can be secured via planning condition.

For information, it is noted that the desk study carried out by Elite Ecology in 2022 included consultation with Staffordshire Ecological Record (SER). The site is located close to the boundary with Cheshire and the desk study should therefore have also included consultation with the relevant ecological record centre for Cheshire. It is not clear if this was carried out. However, in this case, the lack of data for Cheshire is unlikely to be a significant constraint, given the small scale of the development.

SENSITIVE LIGHTING SCHEME

We note and welcome the recommendation in the PEA report (Elite Ecology 2022) for a sensitive lighting strategy to avoid unnecessary light spill onto adjacent habitats. This should be secured via planning condition.

METHOD STATEMENT FOR INVASIVE NON-NATIVE SPECIES

We note that the invasive non-native species (INNS) Himalayan balsam is present on site, and we recommend that a suitable strategy for the treatment and/or removal of Himalayan balsam is provided to ensure that the proposed development does not result in the further spread of this species. The requirement for a method statement for INNS can be secured via planning condition.

PROTECTED SPECIES MITIGATION AND ENHANCEMENT MEASURES

The PEA report (Elite Ecology 2022) identified the presence of blackbird, wren and barn swallow nests within the barn. Mitigation measures to mitigate for the loss of these nest sites are recommended in the PEA, although these appear to be limited to a recommendation for blackbird and wren nest boxes. In addition, we would wish to see replacement nest sites provided for barn swallow, as well as for any additional/new species which may be identified during the update bat survey. As a minimum, we would wish to see 1no. blackbird nest box, 3no. wren nest boxes and 1no. swallow nest box.

The proposed development provides an opportunity for provision of bat roost features, and we would welcome the inclusion of at least 1no. artificial bat roost feature for crevice dwelling species within or

on the proposed development. Additional replacement bat roost features may be required pending the results of the update bat survey.

The detailed specification, number and location of proposed blackbird, wren and barn swallow nest boxes and at least one artificial bat roost feature should be presented on a drawing to be secured via planning condition.

Regards,

Dated 27 August 2024