

Dear Sir/Madam

SMD/2023/0268

Full Minor Application for Proposed Conversion of Farm Building to Form Holiday Accommodation and the Creation of a Manege Ring

TITTESWORTH FARM, Buxton Road, Blackshaw Moor, Leek, Staffordshire, ST13 8TH

0.15 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 (Minor) application for the conversion of an existing redundant piggery into a one bedroom dwelling for holiday accommodation along with the creation of a manege for private use by the applicant for schooling and exercising of horses.

We have viewed the following documents:

- OLME/PP/03/01 Plans and Elevations as Existing;
- OLME/PP/03/02 Proposed Elevations and Plan Layouts;
- OLME/PP/03/03 Location Plan and Block Plan;
- OLME/PP/04/01 Manege Facility Details;
- Bat and Bird Activity Survey Report (Charnia Ecology dated August 2024); and
- Application form dated 30/08/2024.

SUMMARY – Staffordshire Wildlife Trust, having reviewed the information provided, recommends a **holding objection** until further information is obtained, as follows:

1. Potential impacts on Thorncliffe (west of) Local Wildlife Site (LWS) are presented more clearly;
2. Descriptions and evaluation of the habitats within the application site and any trees on or adjacent to the application site should be provided;
3. The building should be assessed for any bat hibernation potential following the guidance Collins (2023); and
4. Assessment of ponds and other waterbodies within 250m of the application site boundary should be evaluated for potential to support great crested newt (GCN, *Triturus cristatus*) or other amphibians/protected species.

We also recommend that the following are secured via condition should approval be granted:

1. Final specification for any tree or hedge planting on the application site;
2. Suitable low impact lighting strategy to retain dark areas for wildlife, accounting for the location of bat and bird boxes;
3. Reasonable avoidance/precautionary working measures for roosting bats and nesting birds, following the approach outlined in the bat and bird survey report and including a pre-works update inspection of the building; and
4. A plan presenting the locations and specification/numbers of all bird and bat boxes, as identified in paragraphs 78 and 79 of the bat and bird survey report.

DESIGNATED WILDLIFE SITES

Several designated wildlife sites are within the local area, the majority of which are assessed as unlikely to be impacted by the proposals. One site, Thorncliffe (west of) LWS, is approx. 150m south of the application site and is a wooded stream valley. This site is noted in the ecology report (Table 6) but no specific evaluation of this designated site is presented. We would recommend that any potential impact of the proposal, including the proposed treatment of sewage and surface water, is more clearly presented in the report, given the close proximity of the LWS to the application site.

HABITATS

Habitats on the application site are not described and no habitat map is presented. The application form indicates trees/hedges are present on the application site. It is not clear where these are and if they are being retained or lost under the scheme.

The proposed manege is to comprise a 45m x 25m area, fenced, levelled and surfaced with sand. Tree planting would be included. There is no information on the existing habitat for the area of the manege creation, therefore, the assessment of the loss of this habitat cannot be undertaken.

A review of the Ordnance Survey (OS) map for the area shows a pond is located very close to the application site and a drain within 250m of the application site. These features are also shown on the Manege Plan Layout with Levels and Sections (Drawing No. OLME /PP/04/002 dated May 2023).

Given the above habitat features and potential impacts, we would expect the report to include an assessment of potential impacts on habitats within the application site and also consider any potential impacts on amphibians (in particular GCN – see below) or other protected species that may be associated with any waterbodies within 250m of the application site boundary.

The inclusion of new tree planting around the proposed manege is welcomed, however, we would recommend the proposed non-native cherry laurel (*Prunus laurocerasus*), which can be invasive and spread nearby areas such as woodlands (where it can overshadow native shrub and ground flora), is replaced with a suitable native species such as spindle (*Euonymus europaeus*), hawthorn (*Crataegus monogyna*) or blackthorn (*Prunus spinosa*). The final specification for planting can be secured by planning condition.

BIODIVERSITY NET GAIN

No Biodiversity Net Gain (BNG) assessment nor Statutory Metric is provided.

The application form provides a brief statement indicating the date of the initial application (prior to 12th February 2024) and size of the application (<0.5ha) to be the reason for exemption.

In England, BNG became a mandatory requirement for most types of development on 12th February 2024 (or 2nd April 2024 for small sites) under Schedule 7A of the Town and Country Planning Act 1990, as inserted by Schedule 14 of the Environment Act 2021. Certain types of development are exempt from BNG.

Providing the Local Authority is content that the application submission date is the relevant date (and not the later valid date), then Statutory BNG would not be required.

SENSITIVE LIGHTING STRATEGY

We note and welcome the recommendation in the bat and bird survey report for a sensitive low impact lighting strategy to minimise disturbance to wildlife and this should be secured via a suitable planning condition.

PROTECTED SPECIES

Bats

The existing building is identified as holding Moderate potential for roosting bats.

The bat and bird survey report provides the results of the two further bat emergence surveys and confirms summer roosting bats are likely absent based on these survey results. Surveys were undertaken in line with current guidance.

However, given the type of building being assessed, the hibernation potential of the building should be presented, in line with Collins (2023).

The report confirms trees on site have no suitable potential roost features (PRF) for bats.

The habitat on site is assessed as Moderate to Low value for bats, in terms of foraging and commuting. Moderate value habitats typically require further assessment of bat activity to inform the scheme (see Table 8.3 of Collins 2023). However, as the likely impacts of the scheme are small, a lack of further assessment of habitats in relation to bats is considered acceptable.

We note and welcome the recommendations for timing of roofing works to the building (para. 69) and that a 'soft demolition' approach to demolition of sections of the building that encroach into the roof or affect the upper courses of brick/stonework is undertaken (para 70). We would also request that a pre-demolition survey of the building is undertaken immediately before demolition is begun, to ensure decisions are based on the most up to date site information. We recommend that all precautionary measures with regards to bats and their roosts are secured through a suitably worded planning condition.

Great Crested Newt

A pond and at least one ditch is within 250m of the application site boundary. As such, the potential impact of the proposed development on GCN and other protected amphibians should be undertaken, following current published guidelines.

Breeding Birds

We note that the bat and bird survey report identifies the presence of active birds' nests in the barn and potential for breeding birds across the site. We agree that timing of works to avoid the bird nesting season would be appropriate to avoid risk of disturbance or harm to these species. This suggest that this is included in a reasonable avoidance measures document that can be secured by planning condition.

Ecological Enhancement

Paragraphs 78 and 79 of the bat and bird survey report provides a series of ecological enhancement proposed for the scheme. These are very much welcomed and should be provided as a plan showing the locations of each of the bat and bird boxes with guidance on their installation and maintenance.

Furthermore, the additional assessments required for bat hibernation and GCN may identify further measures that should be incorporated into the scheme's design (see earlier section).

A plan showing the locations and types of all these features can be secured by planning condition.

Regards,

Dated 23rd September 2024