

Dear Chris Johnston

DET/2024/0009

Application to determine if prior approval is required for the proposed demolition of redundant cattle shed

Tea Leys Farm, Tea Leys, Lower Tea, Staffordshire, ST10 4NS

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:

- Bat and Bird Presence/Absence Survey Report, Evolution Ecology, Sept 2024

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

1. Clarification on bat survey methods, results and mitigation.

Furthermore, irrespective of whether Prior Approval is needed or granted, the applicant should note the presence of confirmed bat roosts means that a bat licence will be required from Natural England prior to any demolition taking place. We therefore recommend the application is determined as Prior Approval (or indeed as requiring a planning application if appropriate) with suitably worded conditions as follows:

1. Bat licence to be obtained from Natural England prior to any demolition
2. Bat mitigation and enhancement measures, as detailed in the Evolution Ecology Report (2024) to be implemented; and
3. A sensitive lighting scheme to avoid disturbance to roosting and foraging bats.

FURTHER INFORMATION REQUIRED - BAT SURVEY REPORT

We have reviewed the bat and bird survey report (Evolution Ecology 2024) and whilst we generally concur with the findings that bat roosts are present, we request further clarification on a number of points to ensure that the survey methods and findings and proposed mitigation are robust. In particular:

- The Night Vision Aid (NVA) equipment appears to have a restricted view of parts of the structure – the report should justify and/or explain limitations associated with this;
- The survey deviates from guidance by including a dawn survey – this needs to be justified;
- Additional detail on the bat dropping and butterfly/moth remains is needed e.g. location and numbers (photos would also be useful) to provide further information on potential for other roost types being present such as a feeding roost;
- Confirmation that the 'daytime roost' is a summer day roost (as per the roost types given in the report);
- Assessment of hibernation potential is required following relevant guidelines – with additional actions/timing constraints/mitigation as needed;

- Assessment of risk of transitional roosts being present (given the statement on page 10 of report);
- Bat feeding/foraging habitats should be clearly described/classified – as per the table on page 17 of the report and Section 4.3.3 needs expanding to more clearly explain potential impacts on bats;
- A more detailed assessment of proposed lighting and a sensitive lighting plan is required to maintain flight routes and dark/undisturbed areas for bat box installation (especially important for BLE); and
- Confirmation that proposed locations of bat and bird boxes can be securely fixed to the modern barn structure.

A further minor point to note is that the photographs of equipment readings/recording are not clear – ideally these should be updated to show greater clarity.

We may wish to make further comments once we reviewed the updated report.

Notwithstanding the above, we would re-iterate the need for the applicant to secure a bat licence prior to demolition and to implement the recommended mitigation and enhancement measures as set out in the Evolution Ecology report (2024) and these requirements should be secured via suitable conditions, as appropriate.

Regards,

Dated 31 October 2024