

Dear Sir/Madam

SMD/2024/0398

Listed Building Consent for Alterations to the Farmhouse, Outbuilding and Garden at Cumberledge Farm

The Farmhouse at Farmstead, Cumberledge Farm, Huntley Road, Denford, Leek, Staffordshire, ST13 7JU

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 Listed Building Consent (Alteration) application for internal and external alterations to the farmhouse and for external works to the curtilage. The proposed works to the farmhouse include works to roof structures/re-roofing, chimneys/flues, repointing, removal of cement render, structural repairs and replacement of windows (including insertion of roof lights). Two outbuilding are to be demolished and one rebuilt.

We have viewed the following documents:

- Proposed Site Plan (dated July 2024);
- Summary Ecological Report letter (Leigh Ecology Ltd, dated 28 August 2024);
- Design and Access Statement (Studio Gedye Ltd, dated August 2024); and
- Heritage Statement (Kathryn Sather & Associates, dated August 2024).

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

1. Descriptions and evaluation of the habitats within the application site and any trees on or adjacent to the application site should be provided and any impacts of the proposed scheme should be assessed;
2. Appropriate bat surveys and assessments (including for hibernation) of all buildings/structures and habitats on or near to the site following the guidance Collins (2023) should be undertaken/reported and any impacts of the proposed scheme on bats and their roosts should be assessed;
3. Assessment of the proposed work on other protected or notable species should be undertaken including a desk study as required; and
4. Any impacts on ecology, biodiversity or protected species should be presented in full in the ecology report referencing methodologies used, etc and proposing suitable mitigation and compensation measures as required. Measures for bats should be provided in sufficient detail to enable the LPA to assess the proposals against the '3 tests' within the Habitats Regulations.

DESIGNATED WILDLIFE SITES

Park Lane Farm (north and east of), Caldon Canal Site of Biological Importance (SBI) is approx. 100m from the application site. 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 clearly presented in the ecology report, given the close proximity of the SBI to the application site.

HABITATS

Habitats on the application site are not described and no habitat map is presented. The site plans suggest trees are adjacent to the site with root protection areas (RPA) potentially within the site. It is not clear if they are being impacted by the proposed scheme (including indirectly, by lighting or drainage for example) or if/how they are to be protected.

A review of the Ordnance Survey (OS) map for the area shows watercourses / waterbodies within 500m of the application site, including the Caldon Canal, that are linked to the site by habitat potentially suitable for wildlife movement. We note there is a 'well' marked on the application site.

Given the above habitat features and potential impacts, we would expect the ecology assessment to include an assessment of potential impacts on habitats within the application site, trees on/adjacent to the site and also consider any potential impacts on amphibians or other protected species that may be associated with any waterbodies within 250m of the application site boundary.

PROTECTED SPECIES

Bats

The Summary letter report provided indicates that two species of bat are roosting at the main farmhouse (common pipistrelle (*Pipistrellus pipistrellus*) and brown long-eared bat (*Plecotus auritus*)) and, furthermore, the farmhouse is identified as having High potential for roosting bats. No assessment has been undertaken on any other buildings, structure or habitats on or near to the site in relation to bats. The nature and scale of the work proposed will impact upon these confirmed bat roosts and may result in harm to bats and/or damage/loss of their roosts and the report indicates a bat mitigation licence will be required.

All native species of bat are designated as European Protected Species. Where a European Protected Species will be affected by a proposed scheme, and therefore a licence is required for the development, the LPA should actively consider the '3 tests' within the Habitat Regulations, in order to have due regard to the Habitats Directive. This also ensures that a permitted development is capable of delivering a licensable solution, to avoid potential issues at the licencing stage.

The summary letter report provided is, however, insufficiently detailed in respect to survey, evaluation and mitigation/compensation measures to enable an evaluation of potential impacts on bats and their roosts to be undertaken. The approach does not appear to follow current published methodologies and evaluation approaches. The proposed mitigation/compensation appears inadequate. The report also appears factually incorrect, as it states there is no loft space at the farmhouse while the Heritage Statement provides photographs of a small loft void.

The report states that 'further surveys are required to inform the planning application' and we would agree with this statement.

There appears to be no consideration of the presence of at least two species of bat roosting on the site within the proposed plans submitted. For example, only certain breathable roofing membranes can be used where bats are known to be roosting and this should be included in the plans as should the bat roost locations and any mitigation/compensation measures proposed (such as locations / specifications of bat slates, etc.).

Further information is required including, but not necessarily limited to, the following:

- Detailed bat surveys of all buildings and structures on or near to the site within the wider farm complex;
- Assessment of bat hibernation potential for these same buildings and structures;

- An assessment of the habitats on site (including detailed assessment of any trees within 30m of the application site boundary) for use by foraging and commuting bats;
- An assessment of any habitat linkages between the use of the site by bats and the habitats in the wider area, including the nearby canal; and
- An evaluation of how the proposed work is predicted to impact bats and their roosts and the suitable mitigation and compensation measures to be provided.

All surveys, evaluation and reporting should be in line with suitable current guidance including Collins (2023).

Other Protected Species

There is no assessment / mention of potential for other protected species, including nesting birds, and this assessment should be provided. This may require a desk study to be undertaken.

BIODIVERSITY NET GAIN ASSESSMENT

The Local Authority (LA) should satisfy themselves that the application meets the relevant exemption criteria under planning in relation to Statutory Biodiversity Net Gain (BNG) and Listed Building Consent. If the application cannot be exempt a BNG assessment will be required.

We look forward to receiving the additional information in due course.

We may wish to make further comments on this application upon review of the additional requested information.

Regards,

Dated 02 December 2024