

Hollins Farm Hollins Lane Staffordshire Wildlife Trust

Comments

Application Reference: SMD/2024/0510

Location: Hollins Farm, Hollins Lane, Hazelcross, Kingsley, Staffordshire, ST10 2EW

Proposed Development: Refurbishment of existing farmhouse; Conversion and change of use of attached agricultural 'shippon' and 'lean-to' (Building A) as an extension to existing farmhouse, including external alterations; Demolition of existing agricultural buildings (Buildings B & C); Proposed new annex to the existing farmhouse in place of the proposed demolition of existing equestrian building (Building D) and; Proposed new detached double garage (Building E) in place of former agricultural building (Building C), outhouse and existing static caravan.

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.

Staffordshire Wildlife Trust recommend a **holding objection** until the following information has been supplied, assessed and resolved:

- BNG report and completed statutory metric tool.
The application form states that the development is 'subject to the de minimis exemption (development below the threshold)' and that the 'development does not impact a priority habitat and impacts less than 25 square metres of on-site habitat'. Looking at the location plan for the development red line boundary, the photographs in the bat and bird report and aerial photography, it appears that there is vegetation covering more than 25 square metres within the red line boundary. Evidence should be provided if this is not the case, otherwise a BNG assessment should be completed and a BNG report and completed statutory metric tool supplied.
- PEA and other protected species (only bats and birds have been considered) statement / assessment.
There is no statement regarding / assessment of potential for other protected species to be affected by the proposal and this should be provided. A data search for protected species was carried out, however, only bat records are reported.

Bat and Bird Report

- 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 or maternity roost (the latter, given that the surveys do not cover the later summer season).

- 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 27 of the report and Section 4.3.3 needs expanding to more clearly explain the rationale behind the ‘negligible’ potential impacts on bats given a roost is present on site and to ensure the roost is not abandoned due to (for example) increased lighting, etc.
- Actual timings of the bat surveys are not provided within the report, only dates and the type of survey. Please supply the survey timings including the sunrise / sunset time.
- An ‘at darkest point’ NVA screenshot is required for each NVA used and for each survey to ensure they are recording appropriately and there is adequate visibility.
- Any limitations on the NVA survey should be described and accounted for (one surveyor is mapped as having no NVA equipment on Fig 2).
- The bat and bird report does not identify any potential bat roosts or bird nesting sites within vegetated areas in the red line boundary. The aerial photos suggest there may be bushes / trees within the red line boundary. Clarification is sought as to whether the site contains vegetation features suitable for nesting birds or roosting bats. If so, appropriate precautions for nesting birds will need to be secured with a planning condition.
- The bat and bird report states it considered protected bird species on-site:
 - ‘To establish if birds were using the site.
 - To locate nest sites if present.
 - To assess what activities were shown within the site of interest.
 - To assess suitable food resources and habitat requirements.
 - To provide an impact assessment if nests are found.’

Minimal information is given in the report regarding bird species or evidence of them seen within the whole site (red line boundary), it only contains tick boxes indicating birds’ nests were not found within the buildings plus a statement that ‘no active or inactive bird’s nests, including owls, were identified during the site surveys’. Further information or a statement detailing the impact of the development and any landscaping on either protected or breeding birds and appropriate working and mitigation procedures considering the whole of the site within the red line boundary and ZOI should be provided e.g. timing of works to avoid the bird nesting season or other appropriate measures if work takes place and nesting birds are discovered on site. We suggest that this is included in a reasonable avoidance measures document that can be secured by planning condition.

- All of the recommendations within the bat and bird report should be secured with an appropriately worded planning condition.

- The inclusion of a hibernation bat box is welcome and its proposed location should be shown on a map.
- Mitigation advice in the bat and bird report should be followed, notably:
 - Development licence needed
 - Timing - work carried out between Nov and March
 - Toolbox talk, but when works will impact bat roosts an Ecologist should be present
 - Soft demolition with any discovered bats put in a hibernation bat box on a nearby tree.
 - Traditional felt and Type 1F underlay used '*from the ridge board down each slope of the roof to 2m on each purlin*'
 - Roost access point retained (using a bat access set from NHBS)
- A sensitive lighting plan is required to maintain flight routes and dark/undisturbed areas for bat access to the retained roost and new bat box to be installed (especially important for BLE). This should be for during and after construction and should be provided and approved as a pre-commencement condition.
- Installation of additional bat and bird boxes for enhancement would be appropriate. There should be a pre-commencement condition for agreeing the number, type and citing.