

Dear Sir/Madam

SMD/2024/0527

Cross Inn, Ash Tree Road, Hoftens Cross, Caudon Low, Staffordshire ST10 3EX

Site = 0.28ha

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 relating to the proposed demolition of a vacant public house known as the Cross Inn. The proposal is to knock the public house down, clear the car park, landscape the area and install an additional 9 caravans. The wider site includes the caravan park that is currently being brought back into use.

We have viewed the following documents:

- Site Location Plan (undated);
- Proposed Floor Plans, Elevations & Site Block Plan (DB/DR/24/08/07, dated December 2024);
- Preliminary Bat Roost Assessment Report (Elton Ecology, dated 3rd July 2024);
- Bat Report (Elton Ecology, dated 17th October 2024); and
- Biodiversity Net Gain (BNG) Report (Elton Ecology, dated 7th August 2024).

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

1. Further information on the bat roost potential of trees on or near to the site in respect of roosting bats should be provided, as habitat mapping (BNG Report) indicates at least one 'very large' tree is present on site;
2. Additional assessment of the hibernation potential of all potential / known bat roost features on or near to the site should be undertaken, including (precautionary) measures to avoid harm to hibernating/torpid bats as required.
3. Further information on the habitats suitability in relation to foraging and commuting bats should be provided given the habitat types presented in the BNG Report, in line with Table 3 given in the Bat Report.
4. Further information on how the species of bat were identified (eg. presentation of echolocation sonogram and/or bat dropping DNA results) should be provided; and
5. Noting in particular the presence of a pond immediately adjacent to the red line boundary, assessment of the potential impact of the proposed development on other protected or notable species should be undertaken given the range of habitats on/near to the site.

A number of planning conditions are also recommended covering avoidance of impacts on nesting birds, provision of a suitable ecologically sensitive lighting plan and provision of a bat box and bird nest box scheme.

DESIGNATED WILDLIFE SITES

The Parks, Windy Harbour Local Wildlife Site (LWS), Ashtree Lodge Pastures, and Hofton's Cross, Windy Harbour LWS, Lawrence House (west of) LWS are all located close to the application site. Hofton's Cross, Caldonlow Regionally Important Geological Site (RIGS) is also located nearby. No

specific evaluation of these designated sites is presented (only Hofton's Croft Meadow LNR is noted in the Biodiversity Net Gain Report, however, there does not appear to be any potential impacts likely as a result of the proposed development.

BIODIVERSITY NET GAIN

A Biodiversity Net Gain Report and Statutory Metric is provided, including baseline habitat and proposed habitat information which is welcomed as is the retention of key ecological features including the mature tree and lines of trees, plus the inclusion of new native hedgerow in the landscape proposals.

The scheme as it is set out in the report and Metric submitted meets the required 10% net gain in habitat and hedgerow biodiversity units.

Please note, the red line boundary used to calculate the Metric dataset does not appear to wholly match that shown on the Site Location Plan. In addition, the total area of baseline habitats mapped in the Metric is given as 0.24ha (excluding individual trees) while the area provided in the application form is 0.28ha. This should be corrected in later submissions of the Metric.

PROTECTED SPECIES

Bats

The Bat reports (dated July and October 2024) provide information on the range of bat surveys completed in the building, and these surveys are up to date and are largely in line with current guidance. However, there is no assessment of hibernation potential for the site and this should be undertaken (and mitigation/compensation measures included as necessary).

There appear to be no assessment of trees for potential bat roost features and this should be provided. In addition, further assessment of / information on the habitat suitability of the site for foraging/commuting bats is required given hedgerows and trees/treelines are present.

The building surveys confirm a brown long-eared (BLE) bat summer day roost is present within the building proposed for demolition, along with a common pipistrelle summer day roost. The BLE roost is within the loft and the common pipistrelle roost appears to be associated with the roof tiles. The methods used to confirm these bat species should be provided (DNA analysis, echolocation calls, for example) for clarity.

The nature of the work proposed may result in harm to bats and will include the destruction of the confirmed roosts and the report indicates a bat mitigation licence will be required, as noted in the report.

Outline mitigation and compensation measures are presented in the form of tool box talks, site presence during sensitive works and provision of alternative bat roost sites (bat boxes) and these are appropriate for the roost types identified on site. Details of the proposed bat box scheme should be secured by planning condition.

We note and welcome the recommendation for a sensitive low impact lighting strategy to minimise disturbance to bats and other wildlife and this should be secured via a suitable planning condition.

Other Protected Species

There appears to be suitable opportunities for nesting birds at the site (vegetation and the building) although no evidence of nesting was found within the building. Timing of works to avoid the bird nesting season would be appropriate to avoid risk of disturbance or harm to these species. We suggest that this is included in a reasonable avoidance measures document that can be secured by planning condition.

Bird nest boxes are recommended for the site, and this is welcomed. Details of any bird nest box scheme should be secured by planning condition.

Other protected species may be present on site, given the range of habitats on or adjacent to the site (in particular, noting the nearby pond within the existing caravan site). An evaluation of any potential impacts on other protected or notable species that may use these habitats should be included in the ecological evaluation.

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 24 January 2025