

From: planningcomments@staffs Moorlands.gov.uk
To: [Planning Comments \(SMDC\)](#)
Subject: Comment Received from Public Access
Date: 07 March 2025 14:12:35

Application Reference No. : SMD/2025/0021

Site Address: Well Street Mill Well Street Leek Staffordshire ST13 6JU Leek

Comments by: Matthew James Haydock

From:

31 Meadow Avenue, Wetley Rocks, STOKE-ON-TRENT
Wetley rocks
Staffordshire
Stoke-on-trent
Staffordshire
ST9 0BD

Phone:

Email:

Submission: Objection

Comments: I am writing to formally object to the proposed redevelopment of the building at Well Street Mill until a thorough bat survey has been conducted and appropriate mitigation measures are put in place. I understand that the building in question shows potential for bat roosts from previous surveys, and bats have been recorded adjacent to the site, and I am concerned that proceeding with redevelopment without proper ecological assessment could result in significant harm to protected species and contravene wildlife protection laws.

Bats and their roosts are protected under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 in the UK. These laws make it an offence to damage or destroy a bat roost, whether occupied or not, or to disturb bats during their breeding, hibernation, or migration periods. The building in question, due to its age, structure, or location, appears to have features (e.g., crevices, roof spaces, or undisturbed areas) that could support bat populations. Without a professional bat survey, it is impossible to determine whether the redevelopment would unlawfully impact these species.

National Planning Policy Framework (NPPF) guidelines and local biodiversity policies also require that planning decisions consider the impact on protected species and ensure that adequate surveys are conducted where there is reasonable likelihood of their presence. Redevelopment without such a survey risks non-compliance with these policies and could lead to legal challenges or delays further down the line.

I urge the planning authority to:

Require the applicant to commission a Preliminary Roost Assessment (PRA) by a qualified ecologist to evaluate the building's potential for supporting bats.

If evidence or potential for bats is found, insist on further surveys (e.g., emergence surveys) during the appropriate season (typically May to September) to confirm the presence or absence of bats.

Ensure that any planning permission is conditional on the implementation of appropriate mitigation measures if bats are present, such as the provision of alternative roosting sites or timing works to avoid disturbance.

Approving this redevelopment without addressing these concerns would not only jeopardize local biodiversity but also undermine public confidence in the planning process. Bats play a vital role in our ecosystems, controlling insect populations and contributing to environmental health, and their conservation should be a priority.

I respectfully request that this application be deferred or refused until the necessary ecological assessments have been completed and their findings fully considered. I would appreciate confirmation of receipt of this objection and updates on how this matter will be addressed in the planning process.

Thank you for your attention to this important issue. I am happy to discuss this further if needed.

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