

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 further information submitted as part of the above application.

We have viewed the following additional document:

- Cumberledge Farm House Bat Survey Summary (Leigh Ecology Ltd, dated 28 August 2024).

SUMMARY – Staffordshire Wildlife Trust, having reviewed the additional information provided, recommends that the holding objection can be removed and that **additional suitably worded conditions** can be applied.

Further commentary is provided below.

DESIGNATED WILDLIFE SITES AND HABITATS

Park Lane Farm (north and east of), Caldon Canal Site of Biological Importance (SBI) is approx. 100m from the application site.

The additional bat survey report submitted states '**No impacts** will be felt outside of the footprint of the farmhouse; therefore, no impacts will occur on local wildlife sites of Nature Reserves'.

However, we note that the proposals include works that affect an area wider than the farmhouse footprint (see extract below from the Heritage Statement, Kathryn Sather & Associates Heritage Conservation Consultants Aug 2024). This includes alteration to an outbuilding (OB1) and demolition of two other outbuildings, regrading of external areas and other landscaping works, construction of new inspection chambers for drainage.

Proposed Site Plan Includes:

- Plan new hedge at the boundary to the northeast of the farmhouse.
- Create new timber sleeper and gravel steps to create external access to lower plant room (OB1) level.
- OB1 will house an Air Source Heat Pump (ASHP). Installation of new reversible standing seam zinc roof lightweight structure, within rebuilt natural stone walling.
- Install new gravel perimeter and land drain (if required) at the farmhouse to protect against any further water damage to the existing farmhouse.
- Construct new drystone walling to the southwest of the farmhouse and make good existing line of drystone walling. Remove existing timber fencing.
- Install four new conservative rooflights or similar to rear of the farmhouse lean-to and side extension.
- Install new inspection chambers as required for foul and rainwater drainage on site and specialist drainage design.
- Proposed regrading and lawn to the front of the farmhouse.

Kathryn Sather & Associates

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Cumberledge Park Farm, Huntley Road, Denford: Heritage Statement

- Install new sewage treatment plant (1.2 metres x 1.4 metres) at the southwest boundary. New treatment plant to be positioned minimum 7 metres from farmhouse and 4 metres from OB2.
- OB2 is structurally unsafe and will be demolished and rebuilt as existing.
- Install new Staffordshire blue brick pathway and patio to the front of the farmhouse.
- Install new estate fencing and gate around proposed lawn and parking area.
- Carefully remove and number stone copings of historic drystone to flowerbed height. Reinstall historic copings onto new bedding. Form new planters with timber sleeper surrounds along perimeters of existing historic walling positions.
- Demolish later addition OB3 and create two car parking spaces. Retain and make good existing section of drystone walling adjacent to the existing OB3.

Plate 1 – Extract from the Heritage Statement indicating proposed works are wider than the footprint of the farmhouse and include demolition of two outbuilding (OB2 and OB3) and modifications to one outbuilding (OB1)

A review of the Staffordshire Nature Recovery Network Map¹ indicates the site is within the ‘wetland’ opportunity mapping area but it is not identified as either a Strategic or Semi-strategic location as presented by this mapping portal. However, given the scope of works is wider than that indicated in the ecology and bat reports there are still considerations to be made around protected and notable species that may be present within habitats on site (see below).

PROTECTED SPECIES**Bats**

The further information provided within the additional bat report 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.

However, this report still does not present an assessment on any other buildings, structure or habitats on or near to the site in relation to bats other than the farmhouse itself. Given the nature and scale of the work proposed which includes the demolition of two outbuildings (see Plate 1 above) an assessment of these wider site features would be expected. To date there is no evaluation of any

¹ <https://netgainstaffs.com/map/>

outbuilding for protected or notable species such as roosting bats or nesting birds (including barn owl *Tyto alba* which is a Schedule 1 species and receives additional protection when breeding). Outbuildings are considered suitable habitat for these species to be potentially present within.

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 bat report includes one additional evening bat emergence survey on 19th September 2024, which brings the total evening bat surveys undertaken to the recommended three visits. A single brown long-eared bat was observed emerging from the house on this third survey, assumed from the same location as previous emergences were recorded (flashing near the chimney).

The maximum count of each species (common pipistrelle bats x2 and brown long-eared bats x4) remains unchanged following this additional survey, with roosts reported as summer non-breeding roosts. We note, however, that Night Vision Aids (NVA) were not used for bat emergence surveys and this will have potentially limited the ability of the surveyors to detect any later emerging bats (brown long-eared bats are a generally later emerging species, typically emerging about 1 hour after sunset).

The bat report re-states that the farmhouse has a 'vaulted ceiling therefore no loft space', however this contradicts the Heritage Statement which identifies a loft void above the 'room to the north-east' (See Plate 2 below) which may align with the brown long-eared bat emergence location. It is assumed this area was not assessed for bat potential/usage (for example, by placing a static recorder within the loft to record bat echolocation calls).

Roof

The roof void above the purlins is only visible through the loft access hatch. A ridge board and rafters are visible.



Roof Structure – Ridge Beam, Rafters and Battens

Plate 2 – Extract from the Heritage Statement recording the presence of a loft void which is not mentioned/included in the Bat Report.

As noted above, the buildings/structures within the red line boundary (other than the farmhouse) have not undergone a building inspection and no building/structure (including the farmhouse) has undergone an assessment for bat hibernation potential.

Some further information is provided within the bat report on proposed mitigation and compensation measures, which is welcomed.

In the light of this additional information but accounting for some limitations in the bat survey approach when compared to guidance², we recommend that a pre-commencement condition covering the following points in relation to bats and their roosts is included in any permission granted:

- An updated building inspection for bats is completed on all buildings and structures within the red line boundary, including assessments for summer non-breeding, breeding and winter hibernation potential. All accessible areas should be inspected and evaluated including any loft voids/attic areas and outbuildings/barns.
- The inspection for bats should also include an assessment for nesting birds, including barn owl.
- An Ecologically Sensitive Lighting plan is provided, indicating how potential impacts on any roosts retained and new roosting provisions included in the scheme are to be avoided.

This is to ensure the bat assessment takes into account the full range of buildings and structures on the site in relation to potential for use by bats, including for hibernation, and that compensatory bat roost provision is not negatively impacted by external lighting proposals.

The bat report restates the requirement for a Natural England bat mitigation licence to be in place. The licence application will need to be supported by sufficiently up-to-date and detailed bat surveys and mitigation/compensation measures.

Other Protected Species

There is no assessment / mention of potential for other protected species, including nesting birds.

In the absence of a full assessment, details of measures to avoid disturbance or harm to protected and/or notable species (including nesting birds, hedgehog, etc) during construction should be secured by a suitably worded pre-commencement condition.

The measures should then be applied during the construction period.

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 25 March 2025

² Collins, J. (2016) Bat Surveys for Professional Ecologists: Good Practice Guidelines. 3rd edition. Bat Conservation Trust, London