

10th April 2025
Job no: EE1108

FAO Chris Johnston
Staffordshire Moorlands District Council
Moorlands House,
Stockwell Street,
Leek,
ST13 6HQ

Dear Chris

RE: Staffordshire Wildlife Trust (SWT) Consultee Response

This letter provides further clarification on information requested by SWT in the consultee response (dated 31/03/25) on the planning application SMD/2024/0563 submitted for the proposed development at Little Gorsty Hill Farm Tenford Lane. This letter provides further details relating to the PEA assessment completed with any amendments relating to the BNG assessment being addressed by Elite Ecology. Further detail is provided within this letter in regards to the following points raised by SWT:

- *'Bat Activity Surveys to be carried out on building two.*
- *Clarify why a PRA was not carried out on building 1 when it is directly attached to building 2*
- *Please could clarification be provided as to whether a plan is required to control and prevent the spread of a species listed on Schedule 9 of WCA into the wild.'*

As per the PEA report, two dusk emergence surveys will be undertaken on Building 2 (B2) within the active bat season following Bat Conservation Trust Guidelines. As per the SWT comments we agree that these are to be secured with a planning condition. The two surveys will be undertaken in May 2025 (weather/night time temperature dependent) and be at least 3 weeks apart. Agreed that a sensitive lighting scheme will be implemented in the event B2 is found to support bats.

Building 1 (B1) was not assessed for its bat roost potential as there will be no impact to the exterior of the building including the roof or internally in terms of attic spaces or voids. The only works to be undertaken on B1 is in relation to internal refurbishment in the form of new kitchen, bathroom and general decorating. There will therefore be no direct impact on any roosting bats potentially present within the building. Whilst there is the potential for indirect impacts, as B2 is adjoining the building, this is only at a single storey level and will not impact on any Potential Roosting Feature (PRF). As a precaution, B2 will be sensitively demolished where it joins B1 and machinery will be placed as far away from the building as possible when undertaking the demolition works. Any noise and vibration works are considered to be temporary and of no greater increase than previous background levels when these buildings were used for farming practices and industrial manufacturing. The gable end of B1 will be indirectly surveyed during

the B2 bat surveys which will identify bat activity levels and if any further measures need to be implemented regarding indirect impacts.

There were no Wildlife and Countryside Act 1981 (as amended) Schedule 9 Invasive Species recorded onsite during the PEA site survey however this was undertaken in February where these species cannot always be identified. The Elite Ecology BNG report does indicate that there are invasive species within the onsite hedgerow habitat as this criteria was failed in the condition assessment. No species details, location or extent have been provided however there is confidence that it is not Japanese Knotweed and most likely Himalayan Balsam or other which is easier to control/eradicate. Measures will be implemented in the event there is a risk to spreading into the wild which will be confirmed by Elite Ecology.

Yours sincerely
for Evergreen Ecology Ltd



Richard Laws
Principle Ecologist/Director
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