

Bath House SWT Comments

Application Reference: SMD/2025/0058

Location: Bath House, Basford Green Road, Cheddleton

Proposed Development: Application for Listed Building Consent for - Internal alterations and re-roofing

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.

Documents Viewed:

- 2420 AL21 Site Block Plan, ctd architects, 09/01/25
- 2420 AL27A Elevations as proposed, ctd architects, 09/01/25
- Application Form
- Site location plan, ctd architects, 14th October 2024
- Site plan as existing, ctd architects, 9th October 2024
- 2438 AL07A Site plan as proposed, ctd architects, 14th October 2024
- Bat and Bird Report, Fauna Forest Ecology, April 2025

Summary: Staffordshire Wildlife Trust, having reviewed the additional information provided, has **NO OBJECTION** – and recommends the following be secured via condition should approval be granted.

Recommended Conditions

Pre-commencement Conditions

- Ahead of works commencing at least four bird nesting boxes as specified in the 'site plan as proposed' and PRA. The bird boxes are specified as to be installed on mature trees in the local area. This would include two closed and two open-fronted boxes to benefit a range of species. Boxes should be sited away from prevailing wind and may be fitted at various heights, ranging between 2 and 4m above ground level, fitted to trees behind the site over to the northwest in Peacock Wood.
- Ahead of works commencing, at least four receptor bat boxes will be fitted onsite to one or more trees or the side of a building, ideally 4-5m above ground level. Importantly, bat boxes must be sited away from artificial nocturnal light spill and they must not be sited above windows or other building aspects that may lead to bats being disturbed. Schwegler 1FF bat boxes are recommended because they are known to be used by a number of species and roost types including maternity

roosts, largely because they retain ideal thermal properties because they are built using a mix of wood and concrete (Woodcrete).

- A European Protected Species Licence must be applied for and granted before any works may proceed that will impact bats and their roosts. Evidence that the licence has been granted should be supplied including the method statement prior to the commencement of works. Timing constraints according to the licence should be adhered to.
- Pre-commencement condition to approve a sensitive nocturnal lighting scheme for during and post conservation works. As well as the recommendations in the bat and bird survey report, we would recommend utilising Bat Conservation Trust's [Guidance on Bats and Artificial Lighting at Night](#). The lighting scheme should be submitted to and approved in writing by the LPA prior to the works starting.

As recommended in the bat report, General good practice regarding use of nocturnal lighting is as follows:

- if external artificial lighting is required during or after the construction phase, a low-level/low lux lighting scheme should be implemented to avoid indirect disturbance to nocturnal animals that may utilise local habitats.
- during the construction phase, works will ideally not be carried out after dusk and should not commence until after dawn (it is also recommended that generators and machinery that emit significant noise levels are not left to run through the night).
- light spill should be controlled and if lighting is required at night, hooded shields should be fitted to prevent inappropriate light spill.
- Prior to the commencement of the works and once the licence has been granted, the named ecologist or accredited agent must carry out a final inspection to check for the presence of bats. If any are found, they will be carefully removed and placed in the bat boxes which will serve as a receptor site. Please note, this is included as a pre-commencement condition but should be done as close to the work starting as possible; therefore it should be clear that planning checks should not cause a delay between the checks and commencement of works.
- Production of a CEMP detailing the legal protection afforded to bats and their places of shelter and breeding birds. This should also explain how to proceed if a bat or breeding bird / nest is discovered during the course of the work in the event an ecologist is not present.

Conditions

- Breathable membranes such as Tyvec (among other brands) must not be used if there is risk bats will come into contact with the product.
- Specific bat mitigation and compensation will involve incorporating bat access tiles on the roof pitches and Schwegler 2FR bat tubes in the side aspects of the building to provide continued use of the site by breeding bats (supplement document to be provided in addition to this report detailing locations of bat mitigation and compensation).
- There will be timing constraints associated with the work schedule. If work is carried out in 2025, work cannot commence until October when the maternity colony has disbanded and all pups have subsequently gained independence. All mitigation must be complete and fit for use (as per the supporting method statement) by late April 2026 to allow continued use of the site by the breeding bats. We agree with this, however, in addition bats should not be left without access to their maternity roost during the active bat season and an assessment should be presented to ensure this is feasible within the expected development timeframe. If this is not feasible, additional mitigation/compensation approaches may need to be included.
- All contractors associated with the works must be briefed regarding the legal protection afforded to bats and their places of shelter and also to breeding birds. They should also know how to proceed if a bat or breeding bird / active nest is discovered during the course of the work in the event an ecologist is not present. This should be delivered through the CEMP which is signed off by workers accompanied by toolbox talk(s).
- Either the named ecologist or accredited agent will carry out a watching brief while tiles and other key roofing components are removed, refitted etc. The client will provide secure scaffolding or a cherry picker so the ecologist is able to safely inspect the roof while works are carried out. The supervising ecologist will continue the watching brief until the building (or areas affected by the proposed works) is declared free of bats. Any bats found during this period will be safely removed by the ecologist and placed in the bat boxes. If in the unlikely event a bat is discovered after the ecologist is no longer supervising, works should halt immediately and Fauna Forest Ecology Limited should be contacted for advice.
- The surrounding trees and vegetation onsite as well as some of the gappy tiles on the roof of the stone provided an excellent opportunity for nesting birds. Best practice would be for the works to be undertaken outside of the bird nesting period. Birds typically nest between February through to September. If the works must be undertaken during the bird nesting period, work must not commence until a suitably qualified ecologist has confirmed there is no evidence of bird nesting within the area to be impacted by the proposed works. If an active nest is

discovered, an exclusion zone should be established, and works must be halted in that area until the nest is no longer active. Works should not commence without confirmation from a suitably qualified ecologist that no nesting birds exist within the area of impact. An area surrounding the nest site will be protected from disturbance with a suitable fence (not HERAs fencing) that would include an appropriate buffer zone, as determined by the suitably qualified supervising ecologist. Work will then be avoided in this area until the nest is no longer in use. Buffer zones in this respect will normally be 5m in diameter and will be delineated by canes, cordon tape and signage.

- In addition two sparrow terraces to the side aspects of the building in locations away from open windows, artificial light spill and prevailing winds.
- Condition of sign off that the sensitive lighting scheme for the operational stage has been delivered as per the scheme detailed in the pre-commencement condition.
- The trees surrounding the building were frequently utilised by bats, presumably as navigational reference and for foraging. In view of this, every attempt must be made to retain trees. If any are lost due to the development, they should be replaced using the size guide below:

Trunk Diameter of tree lost to development (cm measured at 1.5 m)	No of replacement Trees
>15	0 – 1
15 – 19.9	1
20 – 29.9	2
30 – 39.9	3
40 – 49.9	4
50 – 59.9	5
60 – 69.9	6
70 – 79.9	7
80+	8