

Knypersley Sports Club Tunstall Road SWT Further Comments

Application Reference: SMD/2025/0007

Location: Knypersley Sports Club Tunstall Road

Proposed Development: Proposed replacement building forming children's nursery

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 read:

- Email from case officer dated 26/02/2025
- Preliminary Roost Assessment, Knypersley Sports Club, Knypersley, December 2024 by Elite Ecology
- Arboricultural Impact Assessment
Land at Bee Active, Tunstall Rd, Stoke-on-Trent ST8 7AH
November 2024
Prepared by Jenna Young – Arboriculturist

Summary: Staffordshire Wildlife Trust, in light of further details has **no objection** and recommends the following to be secured by condition:

- Sensitive lighting scheme to minimise disturbance to wildlife
- Protection of breeding birds during construction
- Precautionary method statements for protected species during construction

In response to our previous comments, a representative of the applicant has replied stating *'we have consulted our Ecologist and Tree consultant who both agree that a BNG is not required and a GLA for the tree is also not required as it is being retained'*. As there will be no impact on the tree, we are happy that the *de minimis* exemption has been met and the site is exempt from BNG.

Sensitive Lighting Design

We would recommend as a precautionary approach that a pre-commencement condition secures a sensitive nocturnal lighting scheme designed for bats before and during construction. We would recommend using Bat Conservation Trust's [Guidance on Bats and Artificial Lighting at Night](#) to guide this. This is because the PRA states *'foraging and commuting bats are anticipated within the local landscape and their presence within the vicinity of the building can be assumed'*. Also the Arboricultural Impact Assessment described the tree on site as a *'Street tree growing in stone wall alcove. Stems contacting stonework of wall. Old pruning wounds from previous crown raising*

works. Some minor branch knothole cavities and minor dead branches throughout crown, typical of age and species', therefore, although the tree is being retained, the AIA suggests there are potential roost features in it and therefore it should be ensured that there is no additional light spill onto the vegetation as a result of this development.

Protection of Breeding Birds During Construction

A condition should also secure protection for potential nesting birds as recommended in the PRA which states *'it is recommended that no works are undertaken on the structure during the bird breeding season (March to August, inclusive). If this timescale cannot be achieved, the structure will be required to be assessed by a suitably qualified ecologist no more than 24 hours before works commence to confirm the presence or absence of active nests. If active nests are located, exclusion zones around the nest will be required until the chicks have fledged the nest.'*

Precautionary Method Statements for the Protection of Mammals

The site has not been assessed for the potential to support protected mammals and the potential for these is likely to be low. However, we would recommend a precautionary approach and that the risk can be adequately managed via a suitable Precautionary Working Method Statement (PWMS). The requirement for a PWMS can be secured by planning condition. This should cover potential entrapment, storage of chemicals etc.

We would welcome the ecological enhancement measures for bats and birds suggested in the PRA to be incorporated into the design.