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ST13 6HQ

11th August 2025

Application Reference: SMD/2025/0237

**4 x glamping pods for overnight guest use, associated services and access.
Side Farm , Cotton Bank , Cotton , Staffordshire , ST10 3DU**

Dear Mr Johnston,

Staffordshire Wildlife Trust owns and manages land surrounding Side Farm and has reviewed this planning application. Since the planning application impacts our landholding, I am writing to give comments as a neighbour on the potential impact on the habitats and species on our landholding.

These comments are separate to the response our Ecological Planning Manager will be making on the plans under the Service Level Agreement between SMDC and ourselves.

Summary: This application is for a relatively small development however, since the valley in which the property is situated is so ecologically sensitive, and due to the potential that once one development is granted permission it could open further similar applications from properties in the valley, we are submitting an **objection** to the proposed development due to the following reasons:-

- Potential for negative impact on water quality in Cotton Brook
- Potential for negative impact to UK Section 41 Habitats and Species in Cotton Dell Nature Reserve
- Potential for negative impact to Bath Pastures Site of Special Scientific Interest

We also have the following general concerns





- Inability of the small access track, over which we have access rights, to cope with increased usage from potential users and service vehicles
- Impact on water source for grazing infrastructure

Further detail

- The current water quality in the Cotton Brook below the proposed development, is ecologically good, demonstrated by healthy populations of aquatic invertebrates, including some nationally rare species such as the logjammer hoverfly, nationally scarce Red Data Book hoverfly species. This and similar invertebrates found on our land have a close association with saturated coarse woody debris in clean woodland streams. The healthy stream also supports several pairs of breeding dipper, amber listed scarce species which needs good quality water. It is rare to have steep valley streams such as the Cotton Brook with good quality.

We have concerns of potential damage to aquatic wildlife from degradation to water quality due to run off from the new foul water treatment plant and also from the regular emptying of chemically treated water from hot tubs.

- Not considered in the Preliminary Ecological Appraisal, Cotton Dell Nature Reserve is a mix of priority habitats. The area surrounding Side Farm is a mix of semi-natural ancient woodland and plantation on ancient woodland, UK Section 41 habitats of principal importance. The proposed development is also situated in close proximity to Heathy Gore and Upper Cotton Dell Sites of Biological Importance.

There is an area of species rich pasture immediately to the north of the proposed development area and also species rich grassland to the south, containing protected and priority species English bluebells.

The woodland hosts priority species such as breeding wood warbler, a red listed bird of conservation concern and song thrush, amber listed NERC Act Section 41 Priority Species. We have evidence that a small historic remnant population of pine marten still exists in Cotton Dell (a UK priority species in urgent need of conservation action, listed under Schedule 5 of the Wildlife and Countryside Act (1981)). We also have concerns that the increased lighting and disruption coming from the camping area will create further damage and disturbance to species and habitats.





- Bath Pastures Site of Special Scientific Interest (SSSI) lies just a few hundred meters away from the proposed development. The SSSI is designated for its collection of species rich grassland habitats. We have concerns over the impact of increased visitor pressure on the features of the SSSI habitat. The ODPM circular 06-20005 stated that EN (now Natural England) should be given notice if an operation is likely to damage special features of a SSSI.

Other general concerns

- Access track. Our land is accessed via a shared narrow single track access track 1500 – 1800 meters in length with few opportunities for vehicle passing. We have concerns over the damage the increased vehicle usage from potential campers and service vehicles will have to the track.
- Water source. Grazing livestock in the area take water from various springs and some piped mains water. This water source is currently unpredictable during times of dry weather. We have concerns that increased demand on mains water on an already unreliable infrastructure will lead to more frequent drying up of water sources for our grazing livestock.

Whilst we recognise the need for rural businesses to diversify into new areas of income, we have grave concerns that opening up this very sensitive valley to further visitor pressure will damage the very species and habitats that make this valley so special. We acknowledge that the development is relatively small, we have seen elsewhere that small developments are then followed by similar applications. Therefore we are submitting an objection as neighbours to the proposed development due to the potential of damage and disturbance to UK protected and priority habitats and species.

Yours sincerely

Head of Nature Reserves & Species Recovery

