

99 Bank End Farm High Lane SWT Further Comments

October 2025

Date: 02/10/2025

Application Reference: SMD/2024/0551

Location: 99 Bank End Farm, High Lane, Brown Edge, Staffordshire, ST6 8RT

Proposed Development: The erection of an agricultural storage building and a twin span polytunnel for the nursery

Documents Viewed:

- Proposed Agricultural Storage Building and Twin Span Polytunnel at Proctor's Nursery, Staffordsire. Ecological Appraisal, March 2025
- Baseline Habitats png file
- Proposed Habittats png file

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.

Original comments in black, updates in green.

Staffordshire Wildlife Trust have no objection to this application, providing that the following is conditioned:

- Provision of three bird boxes
- Pre-commencement condition for suppling a sensitive lighting plan
- Condition showing adherence to sensitive lighting plan

Further

Detail

The Ecological Appraisal clarifies that the development falls under the *de minimis* exemption and that there will be no impact on the watercourse. Therefore, clarification of the date is not required.

It should be noted that, although the development does not meet the 10% BNG requirement, it is still subject to the required net gain as specified in the NPPF and local plan policy NE1. Due to the nature of the development and, adopting a proportional approach, we would suggest this could be achieved through providing some bird boxes but are happy to receive suggestions from the applicant upon how they wish to provide this. This will need to be conditioned – pre-commencement for agreeing citing/ number / type and a further condition on the provision of the boxes.

The applicant suggested the provision of one bird box. We would recommend that three bird boxes are supplied to comply with the requirements of the NPPF, NERC Act and local plan policy NE. These should be made of woodcrete or similar to ensure longevity and placed as per manufacturer's / RSPB guidelines.

The provision of these should be conditioned.

Conditions

Sensitive outdoor nocturnal lighting plan for bats for the construction and operational phases as recommended in the Ecological Appraisal due to the adjacent trees and stream. This should be provided as a pre-commencement condition. We would recommend using Bat Conservation Trust's Guidance on Bats and Artificial Lighting at Night to guide this. There should be a further condition set to provide evidence that the lighting adheres to the sensitive lighting plan upon completion of construction.

As recommended in the Ecological appraisal 'General best practice during the construction and operational phase will be followed to prevent any indirect impacts through runoff such as pollution'. This can be achieved through a condition ensuring the CEMP includes provisions to prevent any indirect impacts on the stream through runoff such as pollution and ensure that workers sign that they have read and understood this prior to starting work.

The provision of three bird boxes. These should be made of woodcrete or similar to ensure longevity and placed as per manufacturer's / RSPB guidelines.