

Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
Staffordshire
ST13 6HQ

Your Ref SMD/2025/0521
Our Ref CRTR-PLAN-2026-46233
Monday 9 March 2026

Dear Chris Johnston,

Proposal: Proposed change of use of land and erection of two external uncovered padel courts, floodlights and associated amendments to the existing car parking layout and landscaping.

Location: Greenway Hall Golf Club, Stanley Road, Stockton Brook

Waterway: Caldon Canal

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals and rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The application site is located to the south of the Caldon Canal and is adjacent to the canal towpath. The canal is designated as a conservation area, and the site is located a short distance east of Road Lock (Lock 8). Top Lock (Lock 9) which is Grade II listed, is about 100m east of the site and forms a notable grouping with a listed stable block, lock cottage and the listed Stanley Road Bridge (Br. 26).

Based on the information available our substantive response (as required by the Town & Country Planning (Development Management Procedure) (England) Order 2015 (as amended)) is the following advice:

The padel courts are proposed to be floodlit and the drawings indicate that there will be four 6m high lighting columns installed at each court; the nearest columns will only be about 6- 7m away from the boundary with the canal towpath.

The Ecological Desk Study notes that *"the key ecological consideration for the proposed development relates to lighting due to the presence of two licensed bat roosts for light-sensitive species (brown long-eared and whiskered bats) within 1 km of the site. The adjacent canal, tree corridors, and golf course provide valuable foraging and commuting habitats, all of which will be retained and are located outside the site boundary"* and further advises that *"the primary objective is to ensure that new floodlighting does not cause light spill onto these habitats. As a benchmark, light levels should not exceed 0.3 lux (equivalent to moonlight) at the edge of sensitive habitats. A lighting plan, supported by lux-spill modelling prepared with ecological input, will be used to demonstrate compliance to the Local Planning Authority (LPA)"*.

The Ecological Desk Study specifically highlights the importance of minimising light spill from the proposed floodlighting onto retained habitats, which include the canal corridor, and further advises that *"lighting should be*

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designed with directional tilt, shielding, and lux-spill modelling to ensure that illuminance at the edge of sensitive habitats does not exceed 0.3 lux. If the lux-spill model confirms compliance, the risk to bats is negligible, and no further surveys should be required. If thresholds cannot be achieved, pre-commencement bat activity surveys should be undertaken to determine habitat use and the site layout or lighting specification redesigned”.

Although the Ecological Desk Study goes on to provide a proposed specification for the floodlighting of the padel courts which incorporates mitigation measures designed to minimise potentially harmful impacts on local wildlife, the application documents themselves do not include any detailed information on the design and installation of the proposed lights other than to indicate that they will be mounted on 6m high columns, nor has any lighting assessment been submitted to show the extent of the illumination and of any light spill onto the surrounding area. There does not appear to be any confirmation that the floodlighting is to be installed in accordance with the recommendations of the Ecological Desk Study.

We therefore consider that the LPA should seek clarification from the Applicant that the lighting to be installed is to comply with the guidance contained in the Ecological Desk Study and ideally, the Applicant should also, prior to determination of the application, provide a lighting assessment undertaken by a suitably qualified consultant that clearly demonstrates the extent to which the site layout and the lighting design/location/installation will ensure that light spill can be avoided or minimised to an acceptable level that will not result in undue harm to wildlife supported by the canal corridor. This will allow a proper assessment of the likely effects of the proposed floodlighting to be made before the application is determined.

We ask that we are consulted again on any further information that is provided on this matter, but if the LPA considers that this additional information is not required prior to determination of the application, we ask that the installation and operation of the floodlighting is controlled via a suitably worded planning condition.

The Landscape Strategy Plan proposes an appropriate approach along the canal-facing boundary which should help to reinforce the role of the canal as a wildlife corridor as well as reducing the visual impact of the development on the canal conservation area. The grouping of listed buildings to the east around Stanley Road Bridge are far enough away that it is unlikely that there would be any impact on their character or setting, particularly with the addition of the planting along the northern site boundary. Implementation of the Landscape Strategy Plan should be secured via a planning condition.

The application documents do not provide any details of either existing or proposed drainage arrangements; it is not clear whether the existing car parking area is positively drained or whether surface water simply runs off. Equally, there is no indication that the proposed padel courts are to be positively drained. Whilst run off from the padel courts is far less likely to contain contaminants than run off from the current car park, it would still be helpful to understand what, if any, surface water drainage arrangements are proposed. Run off should not be directed towards the canal and we further ask that a Construction Environmental Management Plan (CEMP) which specifically considers potential risks to the canal to ensure that, amongst other things, the canal is adequately protected from any risk of contamination, such as from material or windblown debris or contaminated or silty run-off, during construction activities in order to protect water quality in the canal and the wildlife supported by it, is also secured via a planning condition.

Please do not hesitate to contact me with any queries you may have.

Yours sincerely,

Ian Dickinson MRTPI
Area Planner

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