

Upper Heakley Farm SWT Comments

Date: 22.06.2026

Application Reference: DET/2026/0011

Location: Upper Heakley Farm , Ball Lane , Brown Edge , Staffordshire , ST6 8SW

Proposed Development: Application to determine if prior approval is required for a proposed: Change of Use of 2 Buildings on Agricultural Units and former Agricultural Buildings to 4 Dwellinghouses (Class C3), which may include extension of the building and/or building operations reasonably necessary for the conversion

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:

- Application form
- Include the title, author and date of any reports / plans

Summary: We have no **objections**, subject to the following conditions:

Conditions

If the application is approved we would recommend that this is subject to the following conditions.

Bat and Bird Boxes

A pre-commencement condition detailing the number, type and citing of **bat boxes**, **swift boxes** and **barn owl box** along with installation instructions to be submitted to and agreed by the LPA Ecologist. All bat and bird boxes should be made of woodcrete or a similar material to ensure longevity.

The bat boxes should be installed as per section 50 and 51 of the Preliminary Roost Assesment

Reason: *to comply with wildlife legislation including the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1, the National Design Guide and Staffordshire Moorlands Design Guide 18 SPD*

Site Permeability for Hedgehog

All fences installed as part of the proposed development must include a 13x13 cm gap at the base of barriers between gardens and around the perimeter of the site so that all garden space is accessible for hedgehog.

Reason: To prevent harm to species of principal importance in accordance with Policy EQ1 of the adopted Core Strategy and the biodiversity duty within the Natural Environment and Rural Communities Act 2006 (as amended).

Biodiversity Measures

As detailed in the PEA and in accordance with the NPPF and Biodiversity Duty, the following measures for biodiversity should be conditioned:

- The creation of a wildlife pond
- Creation of amphibian and reptile refugia and hibernacula
- Creation of reptile basking areas
- All trees and shrubs should be native species and of local provenance.
- Fruit bearing trees will be planted
- Hedgehog highways should be created in all fences so that hedgehogs can move freely through the development.
- Green roof on new buildings
- Retention of deadwood within the site
- Any roofing membranes used should not harm bats – if a NBCRM is used, a certificate should be provided that proves the roofing membrane selected has passed a ‘snagging propensity test’.

Details of these should be provided along with a location plan before development commences.

Reason: To comply with the Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1, the National Design Guide and Staffordshire Moorlands Design Guide 18 SPD.

Ecological enhancement plan (EEP) – to use for mid-size developments

Prior to the commencement of development, excluding demolition or groundworks, full details, shall be submitted to and approved in writing by the Local Planning authority of an Ecological Enhancement Plan (EEP). The EEP must include details of habitat enhancements appropriate to the scale and nature of the development, including the number, model and siting of any species-specific enhancements and any necessary future maintenance measures. The agreed enhancements detailed within the approved EEP will be installed in full prior to the first occupation of the dwelling and shall thereafter be retained for the life of the development.

Reason: *To comply with the Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1, the National Design Guide and Staffordshire Moorlands Design Guide 18 SPD.*

Invasive Non-Native species management plan

Prior to the commencement of development, an invasive non-native species management plan shall be submitted to and approved by the local planning authority, detailing the containment, control and removal of [... insert species, e.g. Japanese Knotweed ...] on site. The measures shall be carried out strictly in accordance with the approved scheme.

Reason: *To ensure that the spread of invasive non-native species is controlled in accordance with the Wildlife and Countryside Act 1981 (as amended).*

Habitat Management and Monitoring Plan (HMMP)

The development shall not commence until a Habitat Management and Monitoring Plan (HMMP), has been submitted to, and approved in writing by, the local planning authority. This should be prepared in accordance with the approved Biodiversity Gain Plan using the Natural England template or if the Natural England template is not used, the Natural England checklist 2.0 should be used to ensure all relevant information is included. HMMPs should include:

- a non-technical summary;
- the roles and responsibilities of the people or organisation(s) delivering the [HMMP];
- the planned habitat creation and enhancement works to create or improve habitat to achieve the biodiversity net gain in accordance with the approved Biodiversity Gain Plan;
- the management measures to maintain habitat in accordance with the approved Biodiversity Gain Plan for a period of 30 years from the completion of development; and
- the monitoring methodology and frequency in respect of the created or enhanced habitat to be submitted to the local planning authority.
- Targets for each monitoring report
- Details of what shall be included in monitoring reports along with remedial measures and when these will be put in place if targets are not being met
- A risk register

The created and/or enhanced habitat specified in the approved HMMP shall be managed and maintained in accordance with the approved HMMP, and monitoring reports shall be submitted to Local Planning Authority in writing in accordance with the methodology and frequency specified in the approved HMMP.

Reason: *To ensure mandatory biodiversity net gain is delivered as part of the development, in accordance with the requirements of Schedule 7a of the Town and*

Country Planning Act 1990 (as amended), local plan policy NE1, the National Planning Policy Framework (NPPF) and the national design guide.

Woodland Management Plan (WMP) – this is required when a proposed development or activity relies on the sustainable, long-term management of a woodland (typically over 0.5 hectares in England)

No development shall commence until a costed Woodland Management Plan (WMP) prepared in compliance with the UK Forestry Standard (5th Edition, October 2023) and covering x years from completion of the development, has been submitted to and approved in writing by the Local Planning Authority (LPA). The development shall thereafter be completed in accordance with the approved WMP.

Reason: to demonstrate that the development will not detrimentally impact the woodland.

A landscape and ecological management plan (LEMP)

This will likely be for larger cases, especially those where a HMMP for BNG is not required or there are a lot of on-site habitats that are not significant e.g. ornamental hedges, modified grassland, non-native shrubs etc.

A landscape and ecological management plan (LEMP) shall be submitted to, and be approved in writing by, the Local Planning Authority prior to the commencement or of the development. This should cover aspects not included in the HMMP and ground preparation in advance of the HMMP being followed as well as:

- Description of creating appropriate ground conditions for the planned habitats
- Description and evaluation of features to be managed.
- Ecological trends and constraints on site that might influence management.
- Aims and objectives of management.
- Appropriate management options for achieving aims and objectives.
- Prescriptions for management actions.
- Preparation of a work schedule (including an annual work plan capable of being rolled forward over a five-year period).
- Details of the body or organization responsible for implementation of the plan.
- Ongoing monitoring and remedial measures.

The LEMP shall also include details of the legal and funding mechanism(s) by which the long-term implementation of the plan will be secured by the developer with the management body(ies) responsible for its delivery. The plan shall also set out (where the results from monitoring show that conservation aims and objectives of the LEMP are not being met) how contingencies and/or remedial action will be identified, agreed and implemented so that the development still delivers the fully functioning biodiversity

objectives of the originally approved scheme. The approved plan will be implemented in accordance with the approved details.

Reason: to be in line with the NPPF, the National Design Guide, local plan policy NE1, Staffordshire Moorlands Design Guide 18 SPD also to comply with the biodiversity duty (section 40 of the NERC Act).

There are also [supplementary planning documents for the Churnet Vallet, Leek town centre, Cheadle town centre](#) which may need to be referenced.

CEMP – only for large scale developments – RAMs for PWMS for smaller scale developments

No development shall take place until a Construction Environmental Management plan (CEMP) has been submitted to the local planning authority (LPA) this must include:

- Risk assessments of potentially damaging construction activities.
- Identification of biodiversity protection zones.
- Practical measures during construction to avoid or reduce impacts during construction (may be provided by method statements).
- The location and timing of sensitive works to avoid harm to biodiversity.
- The times during construction works when specialist ecologists need to be present on site to oversee works.
- Responsible persons and lines of communication
- The role and responsibilities of an ecological clerk of works or similar competent person.
- Use of protective fences, exclusion barriers and warning signs.
- Sign off that the CEMP has been read and understood by construction personnel

The CEMP shall be adhered to and implemented throughout the construction period strictly in accordance with approved details, unless otherwise agreed in writing with the LPA.

Reason: To prevent harm to habitats and species, including those offered legal protection from legislation including the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended). Also adhering the requirements of the Biodiversity Duty (Section 40 of the NERC Act), to Local Plan Policy NE1

Site specific or optional inclusions in CEMP asks e.g.

- No clearance of trees, shrubs, tall ruderal or brambles between 31st March and 31st August inclusive unless a competent ecologist has undertaken a careful detailed check of vegetation for active birds nests, immediately before vegetation removal, and provided written confirmation that no birds will be harmed and, or appropriate methods are in place to protect nesting bird interest on sites. Any such written confirmation should be submitted to the LPA.
- Japanese Rose must be removed using a suitable methodology before any work is undertaken on the hedgerows.

- Lighting used during construction should minimise impacts on wildlife – this is to be read and signed off by construction workers as part of the CEMP.
- Open excavations or pipes to be sealed at night. Ramps / planking to be installed to permit wildlife to escape being trapped in structures during construction.
- Disposal of waste material on site.
- Pollution protection measures for woodland – reducing dust / runoff

Barn Owls (Nesting)

*Condition 1 - *Maintain continuity of occupation by making temporary alternative provision nearby*

A Barn Owl roosting/nesting box shall be provided for Barn Owls within 200 metres of the development site to which the consent applies at least 30 days before any development works commence. This provision must be kept free from disturbance and remain in place until at least 30 days after permanent provision has been made, in accordance with details that shall have first been submitted to, and approved in writing by, the Local Planning Authority.

Reason: to secure the long-term protection of the species by maintaining continuity of occupation (by providing temporary additional roosting/nesting places on-site)

Informative: the applicant is advised that the above condition has been imposed because Barn Owls are a Schedule 1 Protected Species under the Wildlife and Countryside Act (1981) as amended, which affords them special protection against intentional or reckless disturbance whilst nesting. Barn Owls are site-faithful, highly sedentary, and maintaining continuity of occupation is important for their survival. Please be aware that it is the developer's responsibility to ensure that Barn Owls are not disturbed during development works. To satisfy the condition, on-site protection measures may be necessary, including the establishment of on-site exclusion zones with the use of fencing and signage.

*Condition 2 - *Ensure compliance with legal protection by requiring an immediately pre-development survey*

No building and construction work shall take place within 30 metres of any part of the site containing material evidence of Barn Owl occupation unless survey-based evidence has been provided to the Local Planning Authority that no birds are nesting (at the development site to which the consent applies) within 3 days of work commencing.

Reason: to ensure that nesting Barn Owls are not disturbed by development works and to enable the Local Authority to fulfil its obligation under Section 25 (1) of the Wildlife and Countryside Act (1981).

Informative: the applicant is advised that due to the potential 3-year delay between the granting of consent and works commencing, an immediately pre-development survey is necessary to avoid an offence being committed under the relevant legislation.

Condition 3 - Impose a timing restriction

Development works to which the consent applies must not take place; between 1st March and 31st August or at any time while Barn Owls are nesting and until temporary alternative provision has been made in accordance with details that shall have first been submitted to, and approved in writing by, the Local Planning Authority.

Reason: to secure the long-term protection of the species.

Informative: the applicant is advised that the above condition has been imposed because Barn Owls are a Schedule 1 Protected Species under the Wildlife and Countryside Act (1981) as amended, which affords them special protection against intentional or reckless disturbance whilst nesting. Approximately 75% of nesting cycles occur within this time period. However, nesting has been recorded in every month of the year. Please be aware that it is the developer's responsibility to ensure that nesting Barn Owls and their dependent young are not disturbed during development works.

Conditions

Restriction on occupation of development until specific biodiversity outcomes achieved

The development hereby permitted shall not be occupied until (stipulate the essential matter e.g. bird boxes, bat boxes, artificial otter holt, hibernacula, [REDACTED]) has been installed / constructed in accordance with details shown in the bat and bird box plan / biodiversity measures plan.

Reason: to comply with wildlife legislation including the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1, the National Design Guide and Staffordshire Moorlands Design Guide 18 SPD

Notice of Implementation of Habitat Works

Prior to first occupation of the development hereby approved a completion report, evidencing the completed habitat creation and/or enhancements, has been submitted to, and approved in writing by the Local Planning Authority. The report must evidence that the Habitat Management and Monitoring Plan has been implemented, and that all necessary habitat creation and enhancement work as set out in the Habitat Management and Monitoring Plan have been completed.

Reason: *To ensure mandatory biodiversity net gain is delivered as part of the development, in accordance with the requirements of Schedule 7a of the Town and Country Planning Act 1990 (as amended), local plan policy NE1, the National Design Guide the National Planning Policy Framework (NPPF).*

Restriction on occupation of development until nocturnal lighting plan implemented

The development hereby permitted shall not be occupied until the sensitive lighting plan for occupation / post construction has been installed / constructed in accordance with details shown in the approved Lighting Design Strategy for Light-Sensitive Biodiversity.

Reason: *to comply with the Conservation of Habitats and Species Regulations 2017 (as amended), the Wildlife and Countryside Act 1981 (as amended), Biodiversity Duty (NERC Act Section 40), NPPF, local plan policy NE1. Many species protected by wildlife legislation are active at night (e.g. bats, [REDACTED] and otters are sensitive to light pollution. The introduction of artificial light might mean such species are disturbed / discouraged from using their breeding or resting places.*

BNG is a separate condition, so this does not need mentioning