

Gorsthead Mill Farm SWT Comments

Date: 14.05.2025

Application Reference: SMD/2025/0084

Location: GORSTHEAD MILL FARM , Gorsthead Mill Lane , Bradnop , Staffordshire , ST13 7NL

Proposed Development: Erection of general purpose storage shed at Gorstead Mill Farm

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
- BNG Report- Harvey Hughes, February 2025
- Gain Plan- Harvey Hughes, February 2025
- Proposed Site Plan- go2plan, March 2025
- Site Location Plan- go2plan, October 2024
- BNG small sites metric- Alex Lewis 3rd February 2025

Summary: We recommend a **holding objection** until the following information is supplied and our comments are resolved:

- A PEA, BNG assessment and the BNG metric need to be carried out / completed to include the whole of the red line boundary.
- The new areas to be surveyed should be carried out in an appropriate time for a grassland survey.
- Habitat maps with a north arrow and scale need to be provided – this is a minimum validation requirement as per BNG Planning Practice Guidance
- Draft HMMP should be provided to allow conditions to be set securing on-site BNG.

Further detail

BNG baseline survey was carried out on 28th January 2025. This is considered an unsuitable time of year to carry out a grassland survey. This was acknowledged in the report, with suggestions that species identification is not needed for condition assessments. We would disagree with this statement; species identification is essential for identifying the type of grassland and inputting this into the BNG metric. The UKHab survey should account for any habitat degradation as detailed in the BNG metric user guide. Grassland surveys should be carried out between April and mid-October,

although ideally between May and September before any cuts or grazing. This enables the surveyor to record a more detailed species list including plants which are only visible during these months, which will aid the classification of habitats.

The PEA assessment and subsequent BNG report and metric calculations were not carried out covering the whole of the red line boundary of the site. The PEA, BNG report and metric need to include all of the area within the red line boundary. This will need to be done before we can make further comments. Additionally, if the whole area shown on the site plan is included in the redline boundary, then the site may cover more than 1ha, in which case it would not qualify for small sites BNG metric and the statutory biodiversity metric calculation tool will need to be used.

Based off the [Net Gain Staffs Map](#) the site is slightly within the semi strategic area for grassland; this needs to be considered when completing the BNG metric.

Additionally, woodland is defined as land with more than 25% tree cover. If the newly planted trees cover more than 25% of the area then this would need changing in the metric to woodland.

Coombs Brook runs close to the site, if this is within 10m of the redline boundary then a MoRPh assessment and watercourse net gain may be needed.

None of the maps have a scale or north arrow or a clear key. These need to be on maps as detailed in the minimum validation requirements of the BNG Planning Practice Guidance.

Conditions

There may be future conditions subject to the amended redline boundary and PEA survey.

Due to the possibility of there being suitable bird breeding habitat within the site, all building works should be undertaken outside of the bird breeding season (March to August inclusive). If vegetation and/or structures are required to be removed during the bird breeding season, then a further inspection by a suitably qualified ecologist is required no more than twenty-four hours before these are to be removed. If an active nest is found, a suitable exclusion zone around the nest will be necessary, where no vegetation removal can take place, to preserve the nest until the chicks have fledged.

The proposals are unclear if there will be external lights on the new building. If this is the case, then a nocturnal artificial lighting plan for nocturnal wildlife will need to be created as a pre-commencement condition. This plan will need to be followed during construction and conditioned separately.

BNG Planning Conditions

Please note that there are significant on-site enhancements delivering BNG and these will need to be secured with a planning condition or S106 agreement with SMDC. This is in addition to the net gain condition. [There is government guidance on legal agreements for BNG](#). This will need to be agreed and secured 30 years from completion of development of management and monitoring of net gain, therefore it is likely that the schedule for the monitoring of monitoring by SMDC should be agreed prior to consent being given. The agreement will need to detail what is considered completion of the development and the start of the 30 years of management and monitoring.

The HMMP will also need to be approved and secured by a planning condition or legal agreement – this could be linked to the condition above, however we would recommend that a draft HMMP is agreed to set the condition or S106 securing the management and monitoring of the significant onsite BNG prior to the decision and then the final HMMP is secured in a condition alongside the approval of the gain plan (net gain condition) as a pre-commencement condition, as, if there are changes needed to discharge the net gain condition, the HMMP may need to be altered.