

Moorville Hall Farm, Leek Road SWT Comments

Date: 10.06.2025

Application Reference: SMD/2024/0543

Location: Moorville Hall Farm , Leek Road , Moorville , Cellarhead , Staffordshire , ST9 0DG

Proposed Development: Portal framed agricultural building.

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
- Site Plan- Keystone Agri Ltd
- Farm map and site location- Keystone Agri Ltd
- Site Plan new trees (BNG gain)- Keystone Agri Ltd, April 2025
- 24724Small_Sites_Metric__Statutory_Biodiversity_Metric__Calculation_Tool_Moorville Hall Farm 25.3.25 – Chris Pashby
- Moorville Hall Farm BNG report supplement- Keystone Agri Ltd

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

- The metric is corrected to include the entire redline boundary.
- Evidence of the baseline and proposed habitats is provided and the maps include a key.
- A GLTA and PRA's are carried out on any trees or buildings to be impacted by the development including light spill.

Further detail

The metric calculations were not carried out covering the whole of the red line boundary of the site. The red line boundary is different on the BNG site plan and site location plan; it should be the same for all documents. The 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. Planning portal guidance on redline boundaries can be found [here](#).

It should be noted that if the area within the redline boundary is greater than 1 ha or there are protected species on the site, including bats, then the statutory metric should be used. A data search shows there are bat records within 500m of the site.

We suggest a bat report with GLTA and PRAs for any tree / building likely to be impacted by the construction / operation e.g. any extra nocturnal lights, and how this may affect commuting and foraging bats. A suitably qualified ecologist should decide if further activity surveys are needed. However, if the red line is extended, then there may be more scope for protected species.

Have the priority habitats within 500m of the site been considered? Cresswell's Piece is a Local Wildlife Site and has the potential to support priority species. Impacts to the LWS, such as lighting which may disrupt commuting bats, needs to be considered.

Evidence of the habitats to be created and the baseline habitats on site should be provided, with photographic evidence. Maps with the baseline and proposed habitats would be helpful. Evidence for the metric decisions should be provided and signposted within the 'user comments' column of the metric calculation tool.

Is the good condition other neutral grassland being created in the garden? If this is the case, it cannot count as other neutral grassland and would instead be vegetated garden. A soil test to check if the soil is suitable to create good condition other neutral grassland may be required. As there is significant enhancement on site a draft Habitat Management and Monitoring Plan as part of the application which sets out the proposals for long term maintenance of habitats to be secured through [planning condition](#) or [planning obligation](#) is needed.

The BNG site plan map does not include a key to inform what the habitats are within the red line boundary.

Based off the BNG site plan and BNG supplement provided, the trees to be planted as part of the 10% net gain appear to be outside of the redline boundary. This would then be off-site BNG and should not be included in the Small Sites Metric calculation tool.

Any off-site (blue line boundary) BNG delivery would need to be [registered as a Biodiversity Gain Site](#) with Natural England and secured for 30 years through a legal agreement – either S106 with the LPA or conservation covenant with a responsible body. This would be subject to a Habitat Management and Monitoring Plan (HMMP) which would need to be in place prior to registration.

The applicant may wish to consider whether it would be better for them to extend the red line boundary to include any off-site biodiversity gain delivery as on-site BNG delivery, or deliver the biodiversity gain within the redline boundary. Any extension of the red line boundary does not need to be continuous; it could be separate blocks encompassing the areas within which net gain is to be delivered.

If the redline boundary is expanded to include the planting area, then this additional area needs to be surveyed, and condition assessed for BNG and added to the BNG metric.

Conditions

As the site may have the potential to support bird breeding habitats, all building works should be undertaken outside of the bird breeding season (March to August). 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. This is to ensure that no active nest site is illegally destroyed, due to the protection afforded to all active bird nests under the Wildlife and Countryside Act 1981. If an active nest is found by a site inspection, an exclusion zone around the nest will be necessary, where no vegetation removal can take place, to preserve this feature until the chicks have fledged the nest.

There may be further conditions when the comments above are addressed.