

Land off High Up Lane , Poolend , Leek , Staffordshire , ST13 8SD - SWT Comments

Date: 16 September 2025

Application Reference: SMD/2025/0057

Location: Land off , High Up Lane , Poolend , Leek , Staffordshire , ST13 8SD

Proposed Development: Portal frame agricultural building used for the storage of fodder, straw and bedding

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
- Biodiversity Net Gain Assessment, Evergreen Ecology 2025
- Design and Access Statement, Graham Watkins and Co, undated
- Site Plan, undated

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

- We have insufficient information to determine whether the Biodiversity Gain Condition is capable of being discharged. This will need to be determined by the planning case officer when making their decision.

Further detail

BNG

BNG is a material consideration, and we have insufficient information to consider whether the Biodiversity Gain Condition is capable of being discharged. To enable us to do this for this application, we require the following information:

Baseline Habitats

The red line boundary of the proposed development as illustrated on the Site Plan (undated) does not appear to align with the baseline survey area (Figure 001) in the BNG report. The BNG report, drawings and metric should be updated to ensure the red line boundary and baseline survey area boundary are aligned.

Limited evidence has been provided to support the assertion that the existing habitat comprises modified grassland and no condition sheets have been provided to demonstrate that the grassland is in poor condition. Whilst the photographs provided in

the BNG report do appear to show a modified grassland habitat there is no description of the habitat, details of species present and no details of the number of species per square metre. We recommend the BNG report is updated to include a brief habitat description, species list (appropriately caveated given the suboptimal time of year that the survey was undertaken) and an approximate number of species per square metre. The completed habitat condition sheets should also be included in the report to evidence the baseline habitat condition.

Post-Development On-site Habitats

The proposed post-development habitats as illustrated in Figure 002 of the BNG report do not appear to align with the redline boundary. The BNG report should be revised to ensure the post-development drawing (Figure 002) and the redline boundary are aligned.

No evidence has been provided to demonstrate how the stated 0.0113ha of Other Neutral Grassland in moderate condition will be created or managed. We recommend that the following information is required to demonstrate that the stated habitats are capable of being achieved:

- A LEMP including a more detailed drawing to illustrate the extent and location of the proposed Other Neutral Grassland to describe how suitable ground conditions will be established for the habitats to be created, including a proposed species mix
- Soil test showing conditions are suitable for creation of Other Neutral Grassland
- Draft HMMP detailing management to create desired habitat, timings of when you would expect to see certain conditions and remedial measures for if things do not go to plan; and
- You may wish to submit a draft Biodiversity Gain Plan to provide evidence that the trading rules / net gain hierarchy etc have been met

A condition or S106 will be needed to secure the monitoring of 30 years of management and monitoring after the development has finished. This needs to be agreed with the LPA prior to determination. This condition or S106 agreement should either include the approval of the HMMP or this could be approved in a separate condition. Ideally this should include measures of success and remedial measures if things are not going to plan. We would need to see details of this to determine whether enough measures are in place to ensure that at least 10% BNG is delivered 30 years after development has finished.

We would recommend that you should consider whether the Biodiversity Gain Condition is capable of being discharged when creating the HMMP, as, if the Biodiversity Gain Condition cannot be discharged and changes need to be made to any plans, the HMMP may need to be adjusted to accommodate this.