From:	Curley, Jane
To:	Planning Comments (SMDC)
Subject:	SMD/2019/0368.
Date:	05 August 2019 11:55:18

From: Kate Dewey
Sent: 19 July 2019 17:15
To: Curley, Jane
Subject: Re: Land at Bird Grove Farm, Hilderstone, ST15 8SL Screening opinion SMD/2019/0368.

Dear Jane,

SMD/2019/0368

Bird Grove Farm, New Buildings, Stoke on Trent ST15 8SL

Solar Farm- request for EIA screening opinion

SJ966363

81.75 hectares

Thank you for the additional information provided in the letter dated 11th July 2019 by Cadence Planning.

The presence of ancient woodland has been acknowledged, although we note that Heron Wood (adjacent the northern boundary) is stated in the letter as being ancient woodland, which it is not according to MAGIC. The registered ancient woodland to the north of the site is Hose Wood, however Heron Wood would need investigating in case this is also ancient. As long as a suitable buffer area is provided to any woodland, this should not be an issue.

Assurance is given that should areas of important grassland be found on site, that if necessary the area could be removed from the development area. It is also stated that appropriate surveys for protected and priority species will be undertaken, and if present, suitable mitigation measures will be proposed and put in place. For most species, this would be feasible within the site.

However, in the case of priority ground-nesting birds, any compensation would have to be provided outside of the solar panel site, in an area large enough to support displaced birds from the whole site, unless the panelled area could be reduced to provide such an area within the site. Given the habitat quality present, a compensation area equal to around a quarter of the site may be needed. If all 80 hectares were used, a compensation area might need to be around 20 hectares depending on the density of bird usage. This could still be farmed, but with habitat enhancements and management that would support more birds for the 40 years life of the development. If there is not sufficient space within the landholding to provide this, if necessary, then the feasibility of the project could be compromised. It is not clear whether this has been considered, so I would ask that the applicant confirm that such mitigation would be feasible if needed.

Assurances regarding watercourse protection are welcomed. However, the construction methods are a concern that has not been addressed. It is not clear how the site would be prepared, and whether any land re-grading may be involved. Would in-field vegetation be cleared/ ploughed completely, or will arrays be installed into existing grass? If the entire site

were to be cleared in one go, this could have significant impacts. However if a basic grass cover were established before installation and soil excavation and disturbance were minimised, this would avoid major impacts to soil/ topography.

EIA screening must consider 'the cumulation of the impact with the impact of other existing and/or approved development'. For example there is an existing solar farm 2.6km to the north-east at Lower Newton Farm. There may be other recently approved development in the adjoining boroughs that could have a cumulative impact. It would be helpful to list relevant developments in the area so that this can be considered.

While the additional information has addressed most ecology issues, confirmation of feasible bird mitigation, site clearance/ construction methods, and cumulative impacts are still outstanding.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer

☎ 01889 880122

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