
From: Curley, Jane
Sent: 05 August 2021 11:57
To: Planning Comments (SMDC)
Subject: FW: SMD/2021/0352 Land East of Cellarhead Substation
Attachments: TCPA_EIA_Screening_Matrix_2017_EIA_Regs Land East of Cellarhead Substation 4 Aug 21.docx

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From: Kate Dewey
Sent: 04 August 2021 09:08
To: Curley, Jane
Cc: Alex Fitzroy
Subject: SMD/2021/0352 Land East of Cellarhead Substation

Ref number SMD/2021/0352

Application Location Land East of Cellarhead Substation, Rownall Road, Cheddleton

Application description Adoption of an Environmental Impact Assessment Screening Opinion. Proposed Development of a Battery Storage Facility

Site size hectares 2.65

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.

SUMMARY –

Documents reviewed:

- 102-B-Site Location Plan
- 103-B-Proposed Site Layout
- Statement
- 00 CELLARHEAD-D-104-B- AMENDED SITE LAYOUT

EIA

With regards to potential significant ecological impacts, we feel that the construction of the site itself is unlikely to cause significant impacts as long as net gain is provided. However, were a major fire to occur on the site, this could impact a large area in terms of pollutants, and potentially cause habitat loss via fire spreading. The likely significance would depend on appropriate fire avoidance and management design/ actions during operation.

Ecology

Regardless of whether an EIA is required, a full assessment of the ecological impact is needed. A preliminary ecological appraisal (PEA) with phase 1 habitat survey is required. The PEA will need to assess the fields proposed for development, the boundaries of the site, surrounding habitats where possible, any areas where excavations are needed such as for pipework for drainage or wiring, proposed access, and the areas proposed for the screening bund. It should also assess the areas proposed for enhancement (e.g. tree planting) to ensure they are suitable and that no sensitive habitats may be lost. The PEA will identify any further surveys required.

The development must also ensure a biodiversity net gain is achieved. A Biodiversity Impact Assessment (BIA) using the latest Defra metric should be provided. A sufficiently detailed landscaping plan will be required with areas of enhanced habitat creation and/or restoration to calculate this. It is noted that an area of tree planting is proposed which is welcomed.

Ecology Requirements:

- Preliminary Ecological Appraisal (PEA)
 - Any phase 2 surveys identified by the initial PEA
 - Any other requirements identified e.g. mitigation, compensation
- Biodiversity Impact Assessment (BIA) using latest metric
- Arboricultural survey if tree removal is proposed
- Soft landscaping plan detailing enhancements and full planting details
- Habitat management plan to ensure continued provision post construction.
- Construction Environmental Management Plan (CEMP)
 - Root Protection Areas (RPAs) for retained trees and hedgerows following British Standard 5837
 - Reasonable Avoidance Measures (RAMS) for nesting birds, mammals, amphibians, etc.

DESIGNATED WILDLIFE SITES

The site lies within the Wetley Moor SSSI impact risk zone. Natural England should be consulted.

Unlikely to cause any direct impacts unless a major fire were to occur.

Potential impacts that may result from the proposals include:

- Damage and/or removal of trees and hedgerow for bund creation
- Damage to hedgerow and trees during construction of storage area and underground pipes and drainage
- Displacement of ground nesting birds
- Blocking of mammal commuting routes e.g. badger, hedgehog
- Harm to amphibians (including great crested newts) during excavation and construction work
- Drainage impacts
- Injury to mammals and amphibians during construction phase (e.g. trenches)
- Pollution and fire damage to habitats and species should a fire occur on site.

Biodiversity Net Gain

Enhancements and replacement habitats should be created to ensure net gain. This will need to be sympathetic to the maintenance and safety needs of the site design.

Potential enhancements:

- Green roofs and walls on battery containers

- Tree planting (proposed) – ensure adequate species. Ensure suitable location during PEA
- Meadow creation
- Native hedgerow planting/enhancement
- Bat and bird boxes around boundaries
- Pond, wetland as part of SuDS
- Invertebrate habitat (deadwood within tree planting areas, bare ground, rock piles, wildflowers, ‘bug hotels’)

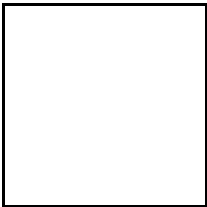
Surface drainage, SuDS

Any sustainable drainage could be designed for wildlife benefit and also for potential water storage in case of fire.

Regards,

Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



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