
From:
Sent: 15 December 2021 18:50
To:
Cc:
Subject: SMD/2021/0695 Land Adjacent Cellarhead Substation

Ref number SMD/2021/0695

Application Location Land Adjacent Cellarhead Substation, Rownall Road, Wetley Rocks, Staffordshire

Application description Erection of a Flexible Energy Facility

Site size hectares 9

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 –Holding objection - further information required.

Required prior to determination:

1. Biodiversity Net Gain assessment to provide evidence of a net gain.
2. Outline drainage plan using SuDS principles to ensure feasibility alongside net gain.

Secure via condition should approval be granted:

3. Amended landscaping plan showing species enhancements, further habitat creation details, soil preparation and appropriate planting/ seeding specifications.
4. Long-term habitat management plan.

Documents reviewed:

- A3 RPA Plan
- A3 Tree Category Plan
- Application Form
- CELLARHEAD-D-101-B-SITE LOCATION
- CELLARHEAD-D-104-K-SITE LAYOUT
- CELLARHEAD-D-106-B-SITE ELEVATION
- Extended Phase 1 Habitat Survey
- LVA Figure 6 Landscape Mitigation Plan
- SPA_0101_Cellarhead Battery Planning Statement 04 10 2021

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

The proposals do not appear to impact on any wildlife sites, and no habitats within the site would qualify as a Local Wildlife Site.

The site is within the 'Pastures' habitat connectivity opportunity area, on the Nature Recovery Network Map for the district. Local corridors and semi-natural habitats include woodland, hedgerows, mature parkland and hedgerow trees and semi-improved/ marshy grassland pastures- some with ridge and furrow visible. The site could contribute to the ecological network by creating similar habitats.

HABITATS

Biodiversity Net Gain

Policy NE1 in the Staffordshire Moorlands Local Plan Adopted September 2020, expects that 'all development where possible seeks to deliver a net gain in biodiversity proportionate to the size and scale of the development. In circumstances where adverse impacts are demonstrated to be unavoidable, developers will be required to ensure that impacts are appropriately mitigated, with suitable compensation measures towards loss of habitat used only as a last resort where there is no alternative' Good practice states that developments should achieve a net gain in both hedgerow and habitat units. It is clear from the proposals that a net gain will be achieved in hedgerow units. The proposals *could* also achieve a net gain in habitat units yet this not as clear. In part this is due to the loss of semi-improved grassland to create woodland, and lack of landscaping details for areas within the fields. Therefore, a Biodiversity Impact Assessment using Defra metric 3.0 is required to provide sufficient evidence. ***BIA required prior to determination.***

More appropriate habitats that fit the local priorities and provide more uplift in biodiversity value should be considered in the final design- see landscaping comments.
All net gain habitats must be secured for a minimum of 30 years. Therefore, a long-term management plan will also be required. ***To be secured via condition.***

Drainage

The application form states that a soakaway is proposed to deal with surface runoff. However, this is not shown on any of the plans. An outline drainage plan is required to assess potential impacts to habitats and feasibility alongside net gain habitats. This should also be included in any net gain calculations.

We encourage the use of open features that mimic a natural habitat such as open ditches and swales where possible. A wetland habitat as suggested within the ecology report could also be included – if conditions are suitable. This would contribute to biodiversity gain.

Outline drainage plan required prior to determination.

Landscaping

Planting - We welcome the proposed native planting. However, some species are included that are not locally native, such as Scots pine, Beech, Horse chestnut, and Guelder rose. These ideally should be replaced with species that are found locally, although it is acknowledged that parkland trees are prominent in the local landscape due to the historic parkland of Rownall Hall.

It is not clear how areas outside of the proposed tree planting will be landscaped.

To tie in with existing habitats and landscapes in the area, the planting should aim for hedgerow enhancement via infill planting and flower-rich margins, and scattered 'parkland' style trees within species-rich grassland. This would allow tree/ scrub planting for screening, but leave habitats open enough to retain the existing grassland for enhancement with a suitable seed mix. Areas under and around solar panels should be seeded with a wildflower grassland mix suited to the soil. Grazing should be considered as a long-term management tool, which could be a more cost-effective solution than mowing, but would require suitable fencing if not present already.

Updated detailed landscaping plan to be secured via condition.

SPECIES

The ecology report found that protected species use of the site would be mostly limited to the boundary features, which will be retained and enhanced as part of the development. The proposed Root Protection Area Plan can act as protection for species that may use the boundary features. Therefore, it is critical that this plan is adhered to and that fencing is installed appropriately. Protective fencing must be installed prior to any other works commencing.

Amphibians and reptiles

The report found that individuals may be present within the boundary hedgerows. As these are to be retained no impacts are anticipated.

Bats

No direct bat impacts are anticipated as trees with roosting potential, and linear commuting and foraging habitat will be retained/enhanced. This is with the exception of lighting, if proposed, in which case a sensitive lighting plan will be required. **Secure via condition if required.**

Birds

The ecology report found that birds are unlikely to be within the field itself and limited to the boundary features which are to be retained. Thus, there will be a negligible impact on birds.

If any management works are required for trees and hedgerows these must avoid the bird nesting season or be subject to a watching brief by an ecologist. **To be secured as part of a condition.**

Species enhancements

The ecology report recommends a number of species enhancements to be included. For ease these are grouped together below. These are considered separate from net gain habitats as net gain should be above and beyond enhancements normally included within a development, with the exception of the wetland area. These include:

- Bat boxes
- Bird boxes.
- Refugia for hedgehogs along southern boundary
- Invertebrate habitat including deadwood piles, south facing bare ground, and rock piles.
- Wetland area as part of surface drainage proposals – *if suitable*.

Enhancements to be secured via condition and detailed on updated landscaping plan.

Regards,

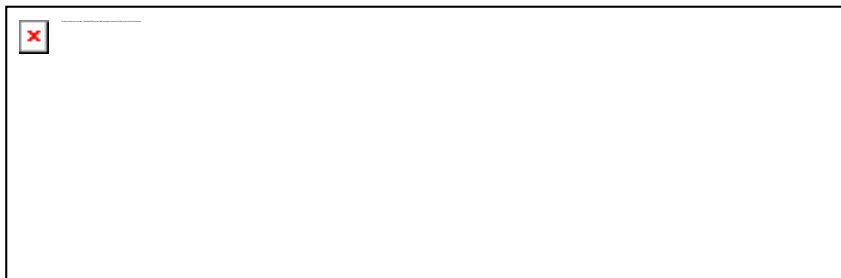
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Planning consultations- please send to planning@staffs-wildlife.org.uk

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