

From: [Alex Fitzroy](#)
To: [Curley, Jane](#)
Cc: [Kate Dewey](#); [Planning Comments \(SMDC\)](#)
Subject: SMD/2021/0695 Land Adjacent Cellarhead Substation, Wetley Rocks
Date: 21 February 2022 11:35:07

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 – amendments required.

Required prior to determination:

1. Inclusion of all impacted habitats within BNG calculations, including the grassland area proposed to be planted for screening. Amend planting to scattered parkland trees.
2. BIA carried out using DEFRA metric 3.0.
3. Confirmation that drainage infrastructure will be located within the application boundary and will not impact on boundary or adjacent habitats.

Secure via condition should approval be granted:

2. Amended landscaping plan showing:

- (1) Details of habitat creation and species enhancements, including those on page 5 of the PEA report (P2359 / 0921 – 02; 12 Jan 22).
 - (2) Soil preparation details.
 - (3) Appropriate planting/ seeding specifications.
3. Long-term habitat management plan.
 4. As per the PEA report (Jan 22):
 - (1) Precautions for nesting birds if work is to take place near to or on hedgerows and trees.
 - (2) Precautions for mammals as per pages 24 and 25.

Documents reviewed:

- Biodiversity Impact Assessment (V1, 04 Jan 22)
- Extended Phase 1 Habitat Survey (V2, 12 Jan 22)
- Tree Survey (V2, 12 Jan 22)

Biodiversity Net Gain

A Biodiversity Impact Assessment (BIA) has been submitted (P2359 / 0122 – 03; 04

January 2022), however the Warwickshire County Council metric has been used rather than DEFRA metric 3.0 as requested. It is best practice to use the most recently adopted metric as this will give the most accurate results. This is also consistent with that provided by other applications in the district. We request that the calculation is updated using the latest DEFRA metric.

The habitat details also need to be revised to include all habitats on the site. This includes the area of poor semi-improved grassland proposed to be lost to woodland screening. This should be altered to instead enhance the grassland and plant scattered trees in a parkland type habitat, that better reflects the Nature Recovery Network as we previously recommended. Whilst woodland planting would be a benefit, the semi-improved grassland may still be of value locally, particularly as it is one of the habitats identified within the local Nature Recovery Network mapping. Trading of semi-improved grassland to woodland may be flagged as an issue within the latest DEFRA metric. Given the new hedgerow also proposed, the screening effect would still be provided.

Please also refer to our previous comments (15 Dec 21).

Drainage

No drainage proposals have been submitted. We would like confirmation that surface drainage proposals will be installed within the application boundary, and will not impact upon any existing trees, hedgerows, or adjacent habitats. If any drainage infrastructure will be installed outside of the red line boundary, then an outline drainage plan will be required to determine impacts.

Regards,

--

Alex Fitzroy BSc (Hons), AMRSB

Planning for Nature Officer



The Wolseley Centre grounds are open daily- if you are planning to visit please read about the centre changes [here](#).

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

P.S. Our planning work is funded mostly by our members - If you'd like to keep me doing what I do, and help us do more, [Please join today](#) or make a donation at <http://www.staffs-wildlife.org.uk/donate>



Are you a member of the Wildlife Trust? Less than 10p per day will help us protect and enhance the wildlife and wild places of Staffordshire. [Please join today!](#)

Staffordshire Wildlife Trust Registered Office: The Wolseley Centre, Wolseley Bridge, Stafford, ST17 0WT. Registered as a company in England & Wales number 959609. This email and any attachments are confidential, copyright Staffordshire Wildlife Trust (SWT), and intended for the recipient only. SWT accepts no responsibility for information unrelated to its business.

Think before you print! Do you really need a paper copy of this email?