
From:
Sent: 04 July 2022 19:38
To:)
Cc:
Subject: SMD/2022/0076 Land Off, Bemersley Road

SMD/2022/0076

Land Off, Bemersley Road, Brown Edge, Staffordshire, ST6 8UL

Construction of a temporary 49.35MW battery storage facility, to include a compound, a DNO control room, a customer substation, security fencing, landscaping and other associated infrastructure.

1.85 hectares

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 –No objection subject to conditions.

Secure via condition should approval be granted:

1. Detailed landscaping plan including soil placement/ preparation and amended habitat creation details.
2. Minimum 25 year habitat management and monitoring plan, including updated BNG metric.
3. Surface water drainage scheme
4. Species protection measures as recommended in the EclA

Documents reviewed:

- Ecological Impact Assessment (EclA) for battery energy storage system (BESS) including Biodiversity Net Gain Calculations using Metric 3.0, dated February 2022 by SLR Consulting
- Landscape Strategy Plan 33489 Rev A dated 07.02.2022 by Barton Wilmore
- Flood Risk Assessment and Surface Water Drainage Strategy, February 2022 by SLR Consulting

DESIGNATED WILDLIFE SITES & WIDER ECOLOGICAL NETWORK

The site is around 40m from the River Trent, a key habitat corridor. This is recognised as corridor 5b in the Strategic GI Network (Map 6.1) in the Staffordshire Moorlands Local Plan Green Infrastructure Strategy May 2018.

The site overlaps both the 'Pastures' and 'Wetland' Habitat Connectivity Opportunity areas as shown within the Nature Recovery Network mapping for the district.

There are no designated wildlife sites nearby or potentially affected by the proposals.

HABITATS

Specific habitat impacts/ opportunities

Native hedgerows are the only priority habitat within the site. Creation of the visibility splay will result in the loss of approximately 82 metres of existing hedgerow (5 metres of H1 and 77 metres of H5, beside Bemersley Road). The other hedgerows will be retained. There will be a loss of low-value grassland from the site.

Given the location, landscape and existing habitats, creation priorities for the site would be species-rich meadow, wetland habitats, hedgerows, scrub and scattered trees.

The Landscape Strategy Plan proposes a length of new native hedgerow, hedgerow enhancement, tussock mix meadow and woodland creation. This is positive and broadly appropriate, but the final design would ideally be adjusted to better fit local character and maximise wildlife value. The access road could perhaps be shortened for a more direct line, and the new hedge joined to existing hedges at both ends. The positions and orientation of the energy facilities should be considered in terms of access for maintenance e.g. hedge cutting and mowing machinery, as there is not much space between the fencing and the site boundaries.

Scrub and scattered tree planting with south-facing scrub edges would be a good option on the eastern side rather than a solid woodland block. In the woodland mix, Hornbeam should be replaced with Alder, and Common Privet and Guelder Rose replaced with Dog rose and Honeysuckle as woodland understorey. Honeysuckle would also be more locally suitable than Wild clematis in hedgerow mix. New hedgerow could incorporate a bank and ditch for extra landscape prominence and habitat variety.

The proposed Emorsgate tussock meadow mix has many non-locally native plants - a more appropriate mix for the location would be a damp grassland/ acid mix, or seed/ hay harvested from a local wildlife site. Local seed is often cheaper and also helps to conserve the donor site. One of the nearby country parks e.g. Biddulph Grange or Knypersley reservoir may be suitable, or Whitfield Valley LNR. The preparation methods are suitable, although harrowing rather than rotavating may be more appropriate to allow seed establishment while avoiding soil disturbance which can increase unwanted weeds. Topsoil stripping may be considered if the soil is very fertile, in order to achieve a diverse grassland.

Wetland features such as swales or a pond are likely to be created through SuDs requirements- see drainage comments.

Invertebrate/ reptile features such as log and brash piles, and bare ground scrapes and micro cliffs should be created within the grassland and scrub. Any spoil from levelling works could be used to create mounds/ basking banks.

A detailed landscape scheme should be secured via condition.

A long-term management and monitoring plan, covering at least 25 years, should be secured via condition.

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'

EclA and BNG metric 3.0 reports a net gain for habitats of 2.01 units (nearly 27%), and 10.64 units (nearly 190%) for hedgerows. The metric has correctly recognised that the eastern part of the site is within an area formally identified in a local strategy. However for full accuracy, the rest of the main site should be considered 'Location ecologically desirable but not in local strategy' due to it being adjacent this corridor and connected through the existing hedgerows. This will give the habitats a greater overall value.

Although detailed design is likely to involve some changes to the landscaping, the site is clearly able to achieve a net biodiversity gain. An updated BNG metric, reflecting final site design, can be supplied as part of the management plan to allow long-term monitoring.

Drainage

The Flood Risk Assessment and Surface Water Drainage Strategy states that the site will incorporate unlined swales on the eastern downslope acting as attenuation SuDS design features, outfalling to an existing culvert into the River Trent. This looks suitable, although should be designed with a more natural form. We understand that battery storage infrastructure may require a water source for fire-fighting. If mains water is not available, rainwater harvesting/ storage might be a consideration. A wildlife pond could be an option. There is adequate space on the site to achieve suitable drainage features with regard to ecology and protection of the River Trent, and we are therefore happy for further detail to be secured via condition.

SPECIES

The species protection measures within the EclA can be secured via condition.

Regards,

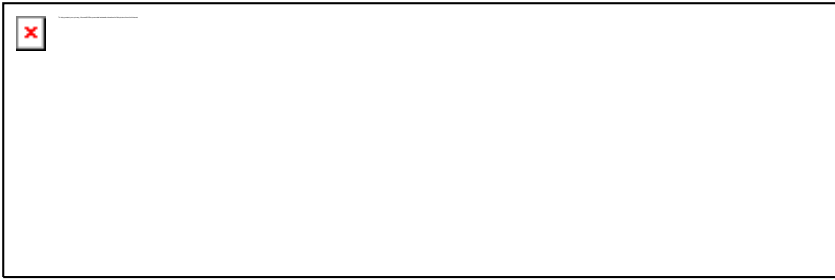
Kate Dewey BSc (Hons) MCIEEM

Senior Planning Officer



Please note, ecology advice is provided to SMDC 2 days per week- working days are normally Tuesdays and Thursdays.

Planning consultations- please send to [p](#)



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