
From: Planning For Nature
Sent: 18 July 2022 19:24
To: Curley, Jane; Planning Comments (SMDC)
Cc: henry.wood@staffordshire.gov.uk; info@phlorum.com
Subject: SMD/2022/0180 Newfields Farm Battery Energy Storage System

Categories:

SMD/2022/0180

Newfields Farm, Rownall Road, Wetley Rocks, Staffordshire, ST9 0BS

Development of a Battery Energy Storage System (BESS) with ancillary infrastructure, security fence, access, landscaping and biodiversity enhancements, to provide balancing services to the local electricity grid

3.1 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 –Holding objection -further information/ amendments required

Required prior to determination:

1. Surface water sustainable drainage scheme
2. Submit BNG metric calculator for review

Secure via condition should approval be granted:

3. Species protection method statements
4. Detailed habitat creation /landscaping plan including site preparation, creation methods, seed and planting mixes
5. Updated BNG assessment using latest metric, including: baseline survey of grassland areas in summer, pre and post-development habitat plans, clear boundary to onsite and off-site habitats.
6. Long term (minimum 25 year) ecology management and monitoring plan

Documents reviewed:

- Preliminary Ecological Appraisal (PEA) Dec 2021 by Phlorum
- Biodiversity Net Gain Report March 2022 by Phlorum
- BNG Appendix 1
- Landscape and ecology mitigations and enhancements plan March 2022
- Staffordshire County Council lead flood authority comments 16 May 2022
- Overall Site Layout 88-10-05-PL-LA-OA 21 March 2022

HABITATS

Specific habitat impacts/ opportunities

The PEA appear to have categorised the habitats on site sufficiently in December 2021, although a baseline survey of grassland in the summer season should be carried out as part of detailed habitat enhancements. The proposed outline enhancements are appropriate, but will need to be refined.

Drainage

We support the comments provided by the local authority flood team regarding the need for surface drainage scheme and would suggest that SuDs features should form part of this to balance, filter water as well as provide added habitat.

There may be a need to divert the existing drainage ditch in the northern part of the site, as this is shown running through part of the infrastructure on the layout plan. The developed areas could benefit from being moved slightly to the east within the field and orientated to avoid areas subject to surface water flooding in the northern and western edges of the site.

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'

The current low value of the majority of site habitats and the potential for enhancement on-site and within the blue line where necessary means the scheme is likely to be able to provide a net biodiversity gain. However the current information is not quite clear enough to be certain.

Please could the full excel biodiversity calculator be supplied for review.

The brook has not been included in the BNG assessment despite being mapped as part of the site habitats. Urban habitats do not seem to have been included in the post-development figures.

The site should not be recorded as 'Within area formally identified in local strategy' because despite being within the green belt, this is not an ecology designation but a landscape one. The site should be considered 'Ecologically desirable but not formally identified in local strategy' due to being among other semi-natural habitats and linear habitats such as woodland blocks and the brook corridor, and shaded as 'semi-strategic' in the district Nature Recovery Network strategic areas map.

The Landscape and ecology mitigations and enhancements plan March 2022 shows some meadow creation outside of the application site, but the BNG calculator does not include any off-site mitigation.

The current habitat proposals do not include any SuDs features. When these are designed, ideally these should provide some habitat of benefit, possibly seasonal ponds or wet grassland rather than the choice of 'bioswale' such that they increase the net gain.

Seeding and planting mixes must be native and appropriate for the site and would ideally be obtained from local sources.

A revised BNG assessment should be provided as a condition alongside the final detailed landscape/ecology scheme. This should use the latest metric (3.1 currently) and include a pre- and post development habitat plans showing UK Habs classification and mapping areas accurately.

A long term management and monitoring plan should also be secured.

SPECIES

Recommended measures to avoid/ protect species can be made a condition.

Fencing will need to incorporate mammal access holes to allow species to access the site, if possible.

Regards,

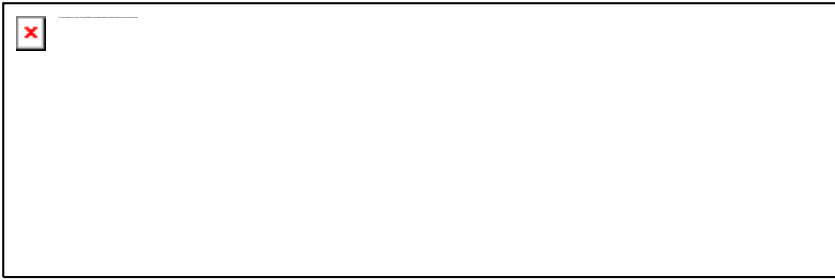
Kate Dewey BSc (Hons) MCIEEM

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



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