
From: Planning For Nature
Sent: 01 November 2022 18:05
To: Curley, Jane; Planning Comments (SMDC)
Cc: info@phlorum.com; henry.wood@staffordshire.gov.uk
Subject: SMD/2022/0180 Newfields Farm

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. Amended surface water sustainable drainage scheme, including pollution prevention measures for fire water/potential contaminants
2. Amended/ corrected BNG metric

Secure via condition should approval be granted:

3. Detailed habitat creation /landscaping plan including site preparation, creation methods, seed and planting mixes, BNG assessment using latest metric with clear pre and post-development habitat plans.
4. Long term (minimum 25 year) ecology management and monitoring plan
5. Species protection method statements

Documents reviewed:

- Newfields BESS Biodiversity Net Gain Calculation V4
- Biodiversity Net Gain Report March 2022 by Phlorum
- Landscape and ecology mitigations and enhancements plan August 2022
- Outline Battery Safety Management Plan July 2022
- Staffordshire County Council lead flood authority comments 16 May 2022
- Flood Risk & Surface Water Drainage Assessment KRS.0612.002.R.001.C dated August 2022 by KRS Environmental

HABITATS

Drainage

The provides more information on site hydrology, the trial pits showing that the soils onsite do not infiltrate well and so a storage feature is required. The Proposed Drainage plan KRS.0612.00 at Appendix 4 shows pipes would collect water from the hard surfaces within the battery storage area, directing this to an underground crate system attenuation tank, then via a flow control structure to discharge from a new outfall into the existing ditch. This watercourse flows eventually into Stanley Pool reservoir, owned by Canal and Rivers Trust which is used for sailing and fishing.

While the report states 'One of the aims of the NPPF is to provide not only flood risk mitigation but also to maximise additional gains such as improvements in runoff quality and provision of amenity and biodiversity.' the proposed solution does not provide improvements in water quality or habitat. The feature also appears to only deal with the additional run-off from the site, and ignores the presence in the same location of a small drain and areas liable to surface flooding in the northern end of the site. An open water feature such as an attenuation pond would be more suited to the site and be able to hold both the extra water generated from the development and the existing water that would naturally pool/ run across this part of the site, diverting it away from the battery storage areas. An engineered outfall would impact the ditch and should be avoided in favour of a wider more dispersed discharge point such as an overspill or wetland area, located after the internal weir chamber that restricts flow. This would aid filtration and present less of an erosion risk. As far as possible pipes should be avoided in favour of open ditches. Surface features offer better habitat as well as any contamination being more easily seen.

The Outline Battery Safety Management Plan July 2022 states that potassium salt will be used as an extinguishing agent should there be a battery fire. If water were applied by the fire service, pollutants could enter the water system as there appears to be no features included to trap or contain contaminants. Further details on this should be provided, and potentially further advice sought from specialist consultees.

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'

We are satisfied that the majority of site habitats are of low value, and the brook is outside of the site boundary on the Overall Site Layout Plan. While the metric shows a positive gain, it is not clear that all data is correct.

Within the Site Habitat Creation sheet, only two habitats are listed, and the areas of new grass, gravel and hardstanding are not included. The Landscape and ecology mitigations and enhancements plan August 2022 indicates a small area of tree planting, with a line for 8 trees- this would not achieve the target habitat of Other woodland;broadleaved. Mixed scrub would be a better alternative here of equal value that would establish more quickly. No hedgerow loss is recorded but the new access track around the farm would appear to cut through an intact hedgerow – this needs to be confirmed.

The application form states the site is 3.10 hectares; the Site Habitat Baseline total area is 3.16 hectares, and Site Habitat Creation areas total 1.06 hectares - all these totals should be the same. The calculator shows an error message "Check Areas – Area of development footprint and habitat creation exceeds the area of habitats lost". This needs to be resolved.

It would be clearer if a post-intervention habitat map could be provided showing the whole application site boundary and the habitat types/areas using UK Habs methods so that the extend of measured habitat parcels can be seen.

The site should not be recorded as 'Within area formally identified in local strategy- this needs to be changed to 'Ecologically desirable but not formally identified in local strategy'.

An amended BNG assessment is required to ensure that BNG can be achieved.

The current habitat proposals do not include any SuDs features –ideally these would be habitat features as mentioned above, but should not decrease the overall achievement of net gain, so could be detailed in the final landscaping/ habitat plans.

The detailed landscaping scheme should include a final metric using the latest adopted version (3.1 currently) and include baseline and post-intervention habitat plans in order to provide a baseline for long-term management and monitoring.

SPECIES

Barn owls have also been recorded in the area, and the site may be suitable to add a barn owl box, as long as there are no safety issues with power lines etc.

Regards,

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

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



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