



Third Revolution Projects

Jane Curley
Staffordshire Moorlands District Council
by email to jane.curley@staffs Moorlands.gov.uk

23rd November 2022

Build Studios
203 Westminster Bridge
Rd, London, SE1 7FR
Registered No.: 10204013

Dear Jane

**Newfields Farm BESS (Application Reference SMD/2022/0180) – Staffordshire Wildlife Trust
Holding Objection**

The note below is in response to further comments received from the Staffordshire Wildlife Trust regarding their holding objection subject to further information being supplied. We believe the information supplied below (along with the revised BNG metric attached to this letter) will be sufficient to resolve the issues that have led to the Trust raising a holding objection, and we hope you therefore now have sufficient ecological information to make your planning recommendation.

The Trust requires further information regarding the following issues:

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

1. Amended surface water sustainable drainage scheme

In its holding objection, the Wildlife Trust has commented as follows:

“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.”

KRS Enviro, who designed the drainage solution, have confirmed that the reason for the underground attenuation storage is due to size constraints. An open attenuation basin would take up significantly more space mainly due to the fact that for safety reasons a basin must have sides with a gradient no steeper than 1 in 3. This means that providing the required volume of water storage would take up much more area than is available.

However, the drainage solution outfall could potentially change from a headwall into the ditch into an overspill/wetland area. In that area the outfall is restricted to 5 litres per second so there would



Third Revolution Projects

be only a gentle flow, but further measures could be included to further mitigated against any erosion.

We believe that this change could be satisfied by a suitably worded planning condition.

Regarding the issue of potential contaminants getting into the wider water system in the event of a fire at the battery facility, KRS Enviro have confirmed that the installation of pollution capture membranes is compatible with the drainage solution set out.

We believe this requirement could be satisfied by a suitably worded planning condition, such as the one attached to a recently permitted battery storage facility in South Staffordshire (application reference 22/00045/FUL, Condition no. 17), which was worded as follows:

“Prior to operation, a SuDS Operations and Maintenance Plan shall be submitted to and approved by the Local Planning Authority.

This shall include installation of pollution capture membranes beneath the infiltration swales, filter drains and battery storage/transformer compounds. Following a fire/contamination event, the impacted areas of the site shall be removed and replaced (i.e., dig out contaminated swales, gravel and membranes).”

2. Amended/ corrected BNG metric

In its holding objection, the Trust raised some questions about the data within the BNG assessment submitted with the application and requested ‘an amended BNG assessment is required to ensure that BNG can be achieved’. They also commented that:

‘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 comment regarding SuDS features has been addressed above, with their absence being due to space constraints on site. Regarding BNG data, a new metric was commissioned from the ecology team at Enzygo, a suitably qualified and experienced consultancy, to address all the comments made by the Wildlife Trust. The detail and justification for what is included and why, and the condition assessments etc. are outlined in the assessor comments at the end of each habitat row.

The new metric has been attached to this response, and confirms that the proposed development would result in a net gain of 11.1% in habitats and a 47.7% net gain in hedgerows.

If we can be of any further assistance in this regard please do let us know. We look forward to receiving your recommendation shortly.

Yours sincerely



Adam Crews

Consultant

Tel

info@thirdrevolutionprojects.co.uk