

From: [Planning For Nature](#)
To: [Swithenbank, Arne](#); [Planning Comments \(SMDC\)](#)
Cc: [Paul Carter](#); [Robert Shaw](#); [Swara Shah](#)
Subject: SMD/2022/0343 Totmonslow Farm
Date: 03 February 2023 16:21:01

SMD/2022/0343

Development of a solar farm with ancillary infrastructure, security fence, access, landscaping and continued agriculture, to generate power to feed into the local distribution network.

Totmonslow Farm, Draycott Road, Totmonslow, Upper Tean, Staffordshire, ST10 4JJ

38.5 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.

Required prior to determination:

1. Corrected Biodiversity Net Gain (BNG) metric to include all watercourses on site and areas lost to built development/ hardstanding.

Secure via condition should approval be granted:

2. Detailed ecology enhancement, management and monitoring in a Landscape Ecology Management Plan, covering the life of the development. To include:
 - a) Breeding bird surveys minimum 3 and up to 5 transects, to identify territories of priority bird species and likely impacts. Bird mitigation plan including timescales, for measures both on and off-site as necessary.
 - b) 1 day invertebrate survey to identify key indicator species and management requirements. Check for Water-violet in ponds and include appropriate conservation actions.
 - c) Soil handling, species mixes and habitat creation techniques
 - d) Updated BNG metric to reflect final design, and appropriate grassland condition under and outside of panels.
 - e) Monitoring and review programme, covering delivery of BNG, Local Wildlife Site status and condition, and key species.
3. Construction Environment Management Plan, with appropriate species protection measures as required by the Preliminary Ecological Appraisal.
4. Appropriate condition regarding GCN district licencing.

Documents reviewed:

- Preliminary Ecological Appraisal May 2022, Phlorum
- National Vegetation Classification October 2022, Phlorum
- Ecological Enhancement, Mitigation and Management Plan v 3 December 2022 by Phlorum
- Ecological Enhancements Mitigations and Management Plan Dec 2022
- 230119_Totmonslow Solar_BNG Update 19.01.23
- Great Crested Newt licensing - impact plan and map

NATURE RECOVERY NETWORK

The site is in the Pastures Habitat Connectivity Opportunity Area, with a small area at the south of the site being covered by the Wetland HCO. Priorities for habitat creation/ restoration are species-rich grasslands and pasture features, such as scattered mature trees, diverse hedges, field ponds, field margins and maintaining a variety of habitat structure e.g. rough grass, ruderals and scrub. Opportunities should also be taken to incorporate SuDs and watercourse enhancements to hold back water and create small wetland areas or reedbeds.

Priority species to focus on encouraging:

- Priority farmland birds especially tree sparrow, skylark, lapwing, yellow wagtail, grey partridge and barn owl.
- Wetland birds such as snipe, willow tit, grasshopper warbler.
- Mammals including Brown hare, harvest mouse, polecat
- Reptiles and amphibians such as grass snake, adder and great crested newt
- Arable 'weeds' and cornfield annuals, rare water plants such as floating water plantain.
- Invertebrates such as dragonflies, priority butterflies, ground nesting bees and wasps.

DESIGNATED WILDLIFE SITES

Local Wildlife Sites

The proposal site includes part of Newton (north-east of) Site of Biological Importance, a Local Wildlife Site of county importance. Since the site was designated in 2000, the NVC surveys carried out show that the fields within the proposal site have been agriculturally improved with most of the former diversity lost; however the habitat interest within hedges and ponds remains. The solar farm landscaping includes wildflower meadow creation and, if well designed, has the potential to restore and enhance the site to its former diversity. As part of detailed habitat creation specifications, reference should be made to the original LWS designation report and species list to guide sowing mixes. Seed or hay from another local diverse meadow should be used rather than a commercial seed mix as far as possible.

Within the long term management and monitoring plan should be an aim to restore the degraded LWS. After 5 years, monitoring should include an assessment of the entire proposal site and any relevant adjoining areas in the landholding against the current LWS criteria, whether for habitat, birds or other species. This should be reported to the LP and the Staffordshire Local Wildlife Sites Partnership facilitate updating the LWS designation as appropriate.

HABITATS

Biodiversity Net Gain (BNG)

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'

Due to the size of the site and the need to also mitigate landscape impacts, we would expect to see at least a 10% net gain in all habitat types (habitat area, hedgerow and river units). The submitted BNG metric shows a gain of over 10% for each of these habitat types, and we expect that after relevant corrections this will still be the case.

Some updates to the metric will be needed to account for likely differing condition of grassland underneath panels relative to areas outside them. It would also be desirable for ponds to be

enhanced as part of the wetland network. As the site clearly has the scope to deliver the required net gain, the detailed landscape design can be reflected in an updated final metric within a Landscape Ecology Management Plan or similar, secured via condition.

SPECIES

Bats

A number of trees were identified as having bat roost potential, but none are proposed to be lost. The Ecological Enhancement, Mitigation and Management Plan (EEMMP) proposes precautionary measures for work near to key bat areas, and provision of bat boxes in trees.

Great Crested Newts, Amphibians, Reptiles

Several ponds are present on the site and have potential to support great crested newts (GCN). No ponds will be lost but temporary impacts to terrestrial habitats will occur. A licence under the GCN district licencing scheme is being sought and measures to protect GCN will be included in construction and habitat management. This will satisfy the need to protect newts, and conserve their habitat in the long term. Conditions required by the district licencing process can be applied.

Precautions for GCN will also allow for protection of other amphibians and reptiles on the site, and the proposed habitat enhancements should benefit any species present.

Birds

An assessment of the site's potential for priority birds and especially ground nesting birds has been made, using available data. Ground nesting and wading birds prefer open landscapes and therefore may be displaced by panels. The site has some potential to support skylark and yellow wagtail, but only one or two fields are large enough, and in general the habitat quality is poor.

Some fields outside of the application site have been secured as potential mitigation areas should key species impacts be identified, and so I am confident that any impacts will be able to be compensated for.

A bird mitigation plan should be secured via condition, informed by breeding bird surveys in the appropriate season to identify territories of all priority and red listed species and predicted impacts. Detailed mitigation within the site and off-site areas where necessary shall be laid out, including timescales. Off-site enhancements created before panels installed.

Invertebrates

Due to high value mature hedges, ponds and woodland within the site, it is likely that some invertebrate species of interest will be present that will have specific requirements. Discussions with the Phlorum ecologist revealed that a number of species reliant on wetland/ dead wood habitats had been seen as part of general surveys on the site. As invertebrates are good indicators of habitat health and support predators such as birds, on this site particularly the management for key species may be sensitive and important to include in the final management plan. A basic 1 day invertebrate study to inform detailed enhancement and management should be secured as part of the final EEMMP/ LEMP. This could be carried out on one of the bird survey visits.

Plants

Records for the area show that Water-violet *Hottonia palustris*, a plant that is rare in the county (in this case recorded from only 6 sites), was recorded on the site within some of the ponds in 2000 as part of the Local Wildlife Site survey. Site monitoring should seek to identify whether and where this plant is still occurring at the site, and include appropriate management to conserve and expand the population.

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 planning@staffs-wildlife.org.uk



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.