

SMD/2023/0533

Installation of a solar farm comprising ground mounted solar PV panels with a generating capacity of up to 49.99MW including mounting system, underground cabling, stock proof fence, CCTV, internal tracks and associated infrastructure, landscaping, biodiversity net gain and environmental enhancements for a temporary period of 40 years

Land At Rownall Farm, Rownall Road, Wetley Rocks, Staffordshire, ST9 0BT

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.

We have viewed the following documents:

- Previous response from Staffordshire Wildlife Trust dated 21/12/2023
- Elite Ecology Biodiversity Net Gain Report June 2022
- Elite Ecology Breeding and Wintering Birds Report May 2024
- Nature Space GCN Advice Note dated 15 December 2024
- Elite Ecology Bat Transect Survey Report September 2022
- Elite Ecology Letter Statement March 2024
- LEMP drawing, Figure 1, P0569, Rev B (dated 5th July 2022)
- Revised Indicative Landscape Masterplan, Figure 22, P0569, Rev D (dated 24th April 2024)
- Elite Ecology Ecological Enhancement Map (dated May 2024)

SUMMARY – We have previously commented on this application (see response dated 21/12/23) with a holding objection and a request for further information relating to biodiversity net gain, birds, barn owl, great crested newts, and bats. Staffordshire Wildlife Trust, having reviewed the information provided, confirms that whilst some additional information has been received in response to our previous comments, we continue to have a **HOLDING OBJECTION** – further information required in relation to the following:

1. Further evidence to support habitat condition assessment for existing and proposed hedgerows

Secure via condition should approval be granted:

3. Landscaping and habitat enhancement details e.g. seeding, planting, soil preparation
4. Landscape and Habitat Management Plan to ensure habitats are managed appropriately for wildlife, particularly skylark, lapwing, grey partridge and barn owl
5. Post-construction monitoring of breeding birds
6. Precautionary method statements for protected species during construction
7. Evidence of EPSL for great crested newts (or Nature Space Report or Certificate submitted prior to determination)
8. Details/specification for species enhancement measures i.e. amphibian hibernacula, pole mounted bat boxes, bird boxes, hedgehog boxes, invertebrate boxes and reptile hibernacula

HABITAT COMPENSATION AND BIODIVERSITY NET GAIN

We have reviewed the BNG Report (Elite Ecology 2022). We note that the BNG Report was prepared in 2022 using Metric 3.1 which was the relevant metric at the time. This is acceptable in this case because the planning application was submitted prior to the introduction of the Statutory Metric on 12th February 2024.

We note that the BNG report (2022) pre-dates the recent revisions to the Revised Indicative Landscape Masterplan (dated April 2024). However, the recent changes to the proposed planting scheme appear to relate to small areas of woodland copse planting on the eastern side of the site only, which have not been included in the BNG calculations. The revisions to the Indicative Masterplan are therefore unlikely to significantly alter the outcome of the BNG assessment.

We have checked the BNG assessment against the baseline habitat types presented in the PEA report (2022), the LEMP (dated 5th July 2022) and the Revised Indicative Landscape Masterplan (April 2024) and agree with the results of the BNG which states a +19.37% net gain in area habitats.

For existing hedgerows, these have all been assessed as 'Poor' condition, but no information has been provided to support this assessment. At the post-development stage, the enhanced and proposed new hedgerows are assessed as being in 'Moderate' or 'Good' condition but no information has been provided to demonstrate how the criteria for Moderate/Good condition will be met. It is likely that the proposed enhancements and new hedgerow planting will deliver a net gain in linear habitat, but a copy of the habitat condition sheets for each existing and enhanced/proposed hedgerow should be provided to demonstrate that the anticipated net gain of +337.06% hedgerow units is achievable.

Details of the proposed landscape creation, enhancement and long-term management can be secured by planning condition.

BIRDS

We have reviewed the Breeding and Wintering Birds Report (Elite Ecology 2024) and are broadly in agreement with the survey findings and recommendations. We note the survey results confirm use of the open ground beneath the overhead pylons by breeding skylark and lapwing which is encouraging and suggests that these species may persist in breeding along this corridor. However, there remains some uncertainty over future success of breeding attempts by skylark and lapwing with the proposed development in place, as this may create a more enclosed environment along the pylon corridor. It is also uncertain whether the tussocky margins will be of sufficient size to support the current population of breeding skylark and lapwing.

If these species are displaced from site, it would represent the loss of potentially 2-3 pairs of skylark and 2 pairs of lapwing, both Red Listed Birds of Conservation Concern, and species of principal importance under the Natural Environment and Rural Communities (NERC) Act 2006.

In recognition of this uncertainty, we recommend a minimum 2-years post-construction monitoring focussing on the breeding bird assemblage, with an annual report submitted to Staffordshire Moorlands District Council setting out remedial measures to maintain the current population of breeding skylark and lapwing if required.

The development is likely to benefit bird species that favour tussocky grassland margins including grey partridge and barn owl. We recommend that future habitat management includes specific objectives to encourage use of the site by grey partridge and barn owl.

The above recommendations can be secured by planning condition.

We agree with the findings of the wintering bird survey that the site does not support a significant assemblage of migratory or wintering bird species.

BARN OWL

Measures to avoid disturbance to barn owl during construction should be included in a precautionary working method statement for protected species, which can be secured by planning condition.

Details of suitable habitat management to encourage use of the proposed tussocky grassland margins by barn owl should be included in the LEMP which can be secured by planning condition.

GREAT CRESTED NEWTS

We have reviewed the Nature Space Advice Note dated 15th December 2024 and agree with the recommendation that a Great Crested Newt licence will be required. The licence can either be secured under the District Level Licence (DLL) route operated by Staffordshire Moorlands District Council or via the European Protected Species Licence (EPSL) route in accordance with the Nature Space Advice Note.

BATS

We have reviewed the bat transect report (Elite Ecology 2022) and note that bat activity transects were completed in April, May and July 2022. We note that no bats were recorded during the April transect and it is possible that this is due to sub-optimal temperatures combined with the relatively early timing of the survey in late April. However, it is unlikely that the overall survey conclusions will be significantly altered by the lack of survey data from the April visit.

We agree with the conclusions of the transect surveys which confirm use of the site by relatively common and widespread species, with activity focussed on boundary features that will be retained and enhanced.

The provision of pole mounted bat boxes is welcomed and details of these, along with other proposed species enhancements comprising amphibian hibernacula, bird boxes, hedgehog boxes, invertebrate boxes and reptile hibernacula as presented in the Ecological Enhancement Map (Elite Ecology 2024) should be secured by planning condition.

Regards,

Dated 4 June 2024